

Jacquelyn Callanen

February 28, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO
ENTERO, ET AL.,

Plaintiffs,

vs.

GREGORY W. ABBOTT, ET AL.,

Defendants.

Case No. 5:21-CV-844-XR

OCA-GREATER HOUSTON,
ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

Case No. 1:21-CV-780-XR

HOUSTON JUSTICE, ET AL.,

Plaintiffs,

vs.

GREGORY WAYNE ABBOTT,
ET AL.,

Defendants.

Case No. 5:21-CV-848-XR

LULAC TEXAS, ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

Case No. 1:21-CV-0786-XR

MI FAMILIA VOTA, ET AL.,

1	Plaintiffs,)	
)	
2	vs.)	
)	Case No. 5:21-CV-0920-XR
3	GREG ABBOTT, ET AL.,)	
)	
4	Defendants.)	
)	
5	<u>UNITED STATES OF AMERICA,</u>)	
)	
6	Plaintiff,)	
)	
7	vs.)	
)	Case No. 5:21-CV-1085-XR
8	THE STATE OF TEXAS,)	
	ET AL.,)	
9)	
	Defendants.)	
10)	

* * * * *

ORAL AND VIDEOTAPED DEPOSITION OF
JACQUELYN CALLANEN
FEBRUARY 28, 2023

* * * * *

THE ORAL AND VIDEOTAPED DEPOSITION of
JACQUELYN CALLANEN, produced as a witness at the
instance of the Defendant, and duly sworn, was taken
in the above styled and numbered cause on Tuesday,
the 28th day of February, 2023 from 9:10 a.m. to
3:51 p.m., before PAMELA SUE PETERSON, Certified
Shorthand Reporter in and for the State of Texas,
reported by stenographic and computer-aided

1 transcription, at the Office of the Texas Attorney
2 General, Weston Centre, 112 East Pecan Street,
3 3rd Floor, San Antonio, Texas 78205, pursuant to the
4 Federal Rules of Civil Procedure and the provisions
5 stated on the record or attached hereto.

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Administrator Lisa Wise

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17 States United Democracy Center

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5 Observer

6 HEENA KEPADIA (Via Zoom Videoconference)
7 Observer

8 ERIC NICHOLS (Via Zoom Videoconference)
9 Observer

10 DAVID FLORES
11 Videographer

12 PAMELA SUE PETERSON
13 Certified Shorthand Reporter

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1 SAN ANTONIO, TEXAS, TUESDAY, FEBRUARY 28, 2023

2 9:10 A.M.

3
4 THE VIDEOGRAPHER: Good morning. We are
5 now on the record. This begins the deposition of
6 Jacquelyn Callanen in the matter of La Union
7 del Pueblo Entero, et al versus Gregory W. Abbot,
8 et al in the United States District Court for the
9 Western District of Texas, San Antonio Division,
10 Civil Action Number 521CV844XR.

11 Today is February 28, 2023, and the time is
12 9:10 a.m. This deposition is being taken at
13 112 East Pecan at the request of the Defendant. The
14 videographer is David Flores and the court reporter
15 is Pamela Peterson. We are with Magna Legal
16 Services. Will counsel and all parties present state
17 their appearances and whom they represent.

18 MS. CUBRIEL: Lisa Cubriel on behalf of the
19 Bexar County Elections Administrator, Jacquelyn
20 Defendant. I'm with the office of the Bexar County
21 Criminal District Attorney.

22 MS. CALLANEN: I'm Jackie Callanen, Bexar
23 County elections administrator.

24 MR. BRYANT: My name's David Bryant. I am
25 one of the attorneys for the State Defendants in this

1 case, and I'm with the Office of the Attorney General
2 of Texas.

3 MS. PAIKOWSKY: My name is Dana Paikowsky
4 and I represent the United States. I'm with the
5 United States Department of Justice.

6 MR. GENECCIN: And I'm Victor Genecin and I
7 represent Plaintiffs Houston Justice, Houston Area
8 Urban League, Delta Sigma Beta Sorority,
9 Incorporated, The Arc of Texas, Mi Familia Vota,
10 Marla Lopez, Marlin Lopez, Paul Rutledge and Jeffrey
11 Lamar Clemens.

12
13 JACQUELYN CALLANEN,
14 having been first duly sworn, testified as follows:
15

16 EXAMINATION

17 BY MR. BRYANT:

18 Q. Miss Callanen, I know you're very
19 experienced at deposition procedures. You've been
20 deposed previously two times in this case alone; is
21 that right?

22 A. Yes, sir.

23 Q. And about how many times overall have you
24 been deposed?

25 A. Probably another four. So, about six.

1 Q. Okay. You understand that you're under
2 oath just as if you were in a court of law as you
3 testify today?

4 A. Yes, sir.

5 Q. And I would ask that if at any time I ask
6 questions that -- that you don't fully understand,
7 will you please ask me to clarify it? And I'll do my
8 best to do so.

9 A. Thank you.

10 Q. Okay. Now, how long have you had your
11 current position as Bexar County elections
12 administrator?

13 A. Since 2005.

14 Q. Okay. And in that capacity, did you have
15 responsibilities with respect to the general election
16 that occurred in November of 2022?

17 A. Yes, sir.

18 Q. Could you describe generally your
19 responsibility for that election.

20 A. Again, as the elections administrator for a
21 county, we are charged with setting up the elections,
22 following the secretary of state's directions,
23 calendar, advisories, the Texas election code.

24 And what that means on the ground level is,
25 actually, our office does the entire election from

1 the poll sites, training the election officers, the
2 clerks, programming our election. We print our own
3 ballots in-house. We contract with the entities. We
4 contract with the facilities, contract with
5 transportation company to deliver all of the
6 equipment, and then we are in charge with tabulation.

7 And so, our election does not stop at the
8 end of election night. We go through the canvas.
9 And so, it's a total package.

10 Q. And approximately how many full-time
11 employees work under your overall supervision or
12 management?

13 A. There are 20 of us.

14 Q. And on election day, about how many people
15 are directly involved in the -- in the operation of
16 the -- the poles and the entire mechanism of the
17 election in Bexar County?

18 A. Approximately 1,200.

19 Q. Okay. Now, today you're here as what's
20 referred to as a Rule 30(b)(6) witness. Do you have
21 an understanding of what that means?

22 A. No, sir.

23 Q. Generally, as I understand it, you're
24 the -- you're the representative of Bexar County --

25 A. Oh, okay.

1 Q. -- and therefore, you're not just
2 testifying -- you're not testifying as an individual,
3 but you're testifying on behalf of your organization.

4 A. Thank you for explaining. Yes, sir.

5 Q. And could you tell me generally what you
6 did to prepare for your deposition today.

7 A. Went back and reviewed numbers, just went
8 back and -- procedures, numbers, policies that we
9 had. Again, November, while -- and that's going to
10 be the focus of this morning as it -- as it should
11 be, but please understand that we are already into
12 the next election, which is coming up as May 6th.

13 And so, a lot of our focus, again, since
14 December, has been moving forward because in a
15 perfect world, that phrase we all hate, you would
16 have six months to prepare. So, we are deep into the
17 May election.

18 And so, I just had to go back and review
19 some of the things that had happened in November.

20 (Exhibit 1 was marked.)

21 Q. BY MR. BRYANT: Okay. I'm going to hand
22 you what has been marked as Exhibit 1 to your
23 deposition. I marked it JC3 so it would show that
24 it's your third deposition in this case.

25 A. Okay.

1 Q. And I would note also that I did not
2 include on your exhibit the cover page. But --

3 THE WITNESS: Is this this one?

4 MS. CUBRIEL: (Nods head in an up-and-down
5 motion.)

6 MR. BRYANT: -- there are copies for
7 counsel down here that --

8 THE WITNESS: So, I'm okay? Okay.

9 MS. CUBRIEL: (Nods head in an up-and-down
10 motion.)

11 Q. BY MR. BRYANT: -- I unfortunately ran out
12 of staples last night to properly secure. But --

13 MS. PAIKOWSKY: Is it just the deposition
14 notice?

15 MR. BRYANT: Yes.

16 MS. PAIKOWSKY: Okay. Okay.

17 MR. BRYANT: Yes. And I figured you had
18 that on your own anyway.

19 THE WITNESS: Yes, sir.

20 Q. BY MR. BRYANT: Okay. And have you seen
21 that before?

22 A. Yes, sir.

23 Q. Okay. There's a list in the -- toward the
24 back of the Exhibit 1 of various topics for
25 examination, and that phrase appears at the top of

1 the page.

2 A. Yes, sir.

3 Q. Did you review that in connection with
4 preparing for your deposition today?

5 A. Absolutely.

6 Q. Okay.

7 A. Yes, sir.

8 Q. Now, could you tell me whether you regard
9 the overall election process for the general election
10 in 2022 in Bexar County as having been relatively
11 successful.

12 A. Absolutely.

13 Q. And would you say that it was more
14 successful than the process that occurred in the
15 primary in -- earlier in 2022?

16 A. Absolutely.

17 Q. And was it more successful and smoother
18 than the general election in 2020?

19 A. Yes, it was smaller.

20 Q. Okay. And in addition to being smaller,
21 would you say it was a smoother process with fewer
22 problems?

23 A. Yes, sir.

24 Q. Now, for the general election in 2022 in
25 Bexar County, did you have the same hours and days

1 for early voting as in the primaries for 2022? Same
2 number of days?

3 A. Yes. Yes, sir.

4 Q. Okay. And did you have the same hours that
5 the early voting locations were open?

6 A. Yes, sir.

7 Q. Is that also true for when you compare
8 November 2022 to the general election in 2020?

9 A. We had fewer in 2022, fewer hours.

10 Q. And why was that?

11 A. Because our commissioner's court ordered
12 that we have two days of extended early voting hours
13 where the poles were open until 10:00 p.m. and our
14 normal is to close at 8:00.

15 Q. And you're describing what occurred in --

16 A. For 2020.

17 Q. In 2020.

18 A. Yes, sir.

19 Q. Thank you. In November 2022 general
20 election, did you have the same hours for voting on
21 election day as you did in the March primaries?

22 A. Yes, sir.

23 Q. Did you have the same hours for voting on
24 election day in November 2022 as in November of 2020?

25 A. Yes, sir. Mandated by law, 7:00 to 7:00.

1 Q. During the election day process in November
2 of 2022, did you have any problems that required you
3 to resupply polling places with ballots on election
4 day?

5 A. Yes, sir.

6 Q. Approximately how many times did that
7 occur?

8 A. If -- if I may explain?

9 Q. Please explain.

10 A. Bexar County has vote centers. And I know
11 you're familiar with those. But for anyone else
12 who's listening, we moved vote centers in 2019. And
13 a vote center is the exact same philosophy,
14 procedures, as early voting. Which means that any
15 citizen, any voter, can go to any one of our 305
16 polls in the county.

17 And so, when you're preparing and assigning
18 ballots, the procedure we use is, you go to the last
19 like election and then you add 25 percent. Well, our
20 last like election in 2018 we were not vote centers.
21 We were specific polling locations.

22 And so, when we looked at our history and
23 our numbers, that didn't quite translate to where we
24 were in our new methodology of allowing people to go
25 anywhere. So, we upped the ballots as we sent out.

1 But our procedure was in any election, because we're
2 an ES&S company -- county, we supply our technicians,
3 we hire a technician for every five sites on election
4 day, rovers, and we assign them ballots. So, they
5 have them so they're able to distribute them if
6 needed. And that has worked very well with us.

7 And so, we did have some poll sites. No
8 one ever ran out. But our election officials tended
9 to get a little nervous if we've given them 800
10 ballots and they saw they are getting down to a
11 hundred, they would ask for more.

12 And so, we were really blessed that that
13 methodology with our -- with our technicians through
14 the chain of custody being able to re-supply if
15 needed. We did have some sites again, as I said,
16 that asked for ballots, but at no time did we have
17 anyone run out.

18 Q. And therefore, is it correct that in
19 November of 2022, general election there was -- no
20 voters had to wait longer in order to get ballots
21 re-supplied?

22 A. Correct.

23 Q. Okay. Were there any delayed openings for
24 any polling places in Bexar County on election day in
25 November 2022?

1 A. No.

2 Q. Were there any early or delayed closings of
3 polling places in Bexar County on election day in
4 November 2022?

5 A. Yes, we did have one poll site, UTSA,
6 University of Texas San Antonio, their main campus.
7 And --

8 Q. What occurred there?

9 A. -- they -- they had longer lines than
10 normal. And when we did our After Action Report, is
11 what we call it when we spoke with the officials,
12 they -- the issue at UTSA was that, obviously,
13 students were voting there. But as the students were
14 there in line, about 50 percent of the students did
15 not understand that because they were registered at
16 home, they needed to be registered in Bexar County.

17 So, the interaction between the voter and
18 the staff was much longer than in a normal poll where
19 you come in with your card, you're registered to
20 vote, we look you up, and you go.

21 And these interactions slowed the process
22 or grew the line, if we want to say that, from the
23 normal -- you know, normally they can get a person
24 through in 30 seconds. Just, here you go.

25 But these interactions were taking five,

1 10 minutes per student because a lot of explaining
2 had to go on, a lot of checking had to go on. And
3 so, that pushed it back. And so, their poll site was
4 open until 10:00

5 Q. Okay. Were the students that required the
6 additional interaction ones that actually were
7 resident in other counties --

8 A. Yes.

9 Q. -- of Texas?

10 A. Yes, sir. I'm sorry I interrupted you.
11 Yes, sir.

12 Q. And as a result of this additional time
13 that the process took, did -- was anyone unable to
14 vote who was entitled to vote?

15 A. No, sir.

16 Q. And did that polling place remain open
17 until 10:00 p.m. when all of the -- the voters who --
18 who were present had had an opportunity to vote if
19 they were eligible?

20 A. Absolutely.

21 Q. Okay. Were there any other earlier delayed
22 closings of polling places in Bexar County on
23 election day in November 2022?

24 A. No. I mean, we had a number that they
25 actually had people and they finished voting at

1 8 o'clock, but that seems to be the norm.

2 Again, it seems to be human nature that
3 they will arrive at the poll at 6:00 or 6:30.
4 They're going to do it at the last minute, and that
5 creates a line. And so, obviously, the law is if
6 you're on the property, or if you're in line at
7 7:00 p.m., then you're eligible to vote.

8 And the election officials will stay there
9 and process until it's finished. And so, yes, we
10 still had some people being processed at, you know,
11 7:30, 8 o'clock.

12 Q. To the best of your knowledge, did everyone
13 who was in line to vote by 7:00 p.m. on election day
14 in November 2022 and was otherwise eligible get a
15 chance to vote?

16 A. Yes, sir.

17 Q. Okay. Did Bexar County have any
18 significant problems with wait times at any polling
19 places on election day in November of 2022?

20 A. As I previously said, just the UTSA campus.

21 Q. Okay. Did voters have the ability to get
22 any information about wait times at polling places in
23 Bexar County online in November 2022?

24 A. No, sir. We don't have any program like
25 that.

1 Q. Okay. Were there any significant problems
2 with the voting process on election day in November
3 2022 that we haven't already touched on?

4 A. No, sir.

5 Q. Did Bexar County make any changes in its
6 election day procedures between the first half of
7 2022 and the general election in 2022?

8 A. For our in-person voting?

9 Q. Yes.

10 A. No, sir.

11 Q. Did Bexar County experience any kind of
12 technology malfunctions with respect to its voting
13 technology on election day in November of 2022?

14 A. Absolutely.

15 Q. Okay. Could you describe those.

16 A. Again, previously, I had said how lessons
17 learned, that we've developed our procedure by having
18 technicians out in the field and being assigned to
19 five locations. Because our -- our election sites
20 now, and with our election officials, we give them so
21 much technology, from electronic poll books, to
22 printers, to scanners, to say nothing of the election
23 equipment.

24 And so with anything, there's going to be
25 hiccups with anything. Our poll sites, we

1 historically assign eight express votes or -- or
2 ballot markers where the voters can -- can vote.

3 And we do that because inherently a ballot
4 or a piece of paper will get stuck in one of them.
5 And so, we make sure we have enough to keep going.
6 And if the ballot card gets stuck in one, you know,
7 they reprocess the voter, send them to another unit.

8 But in the meantime, that election official
9 will call their assigned technician. So, this goes
10 on all day long. So, I -- I can't tell you, you
11 know, exactly how many times. But it would be naive
12 to say that we didn't have any kind of mechanical
13 technology or equipment.

14 And -- and please remember, there are two
15 separate systems at every one of our poll sites. One
16 of our systems is the qualifying or the poll book,
17 putting the voter into the system. And the other
18 system is the actual casting of the ballot. They
19 don't talk to each other, but it's two separate
20 systems. And so, as I said, that's a lot of
21 technology that we've put out there.

22 Q. Was anyone who's otherwise eligible unable
23 to vote in Bexar County on election day in November
24 of 2022 because of technology glitches or
25 malfunctions?

1 A. No, sir.

2 Q. To what extent, if any, did any voter have
3 to wait longer to vote because of any technology
4 malfunctions that occurred on election day in 2022
5 November in Bexar County?

6 A. There's -- there was, I want to say, a
7 misrepresentation, miscommunication from one of our
8 poll sites early in the morning, that when the
9 officials got there, the poll book, the electronic
10 poll book, was giving them problems with the printer.

11 And so, again, all of our officials are
12 trained to handle it manually. It takes longer,
13 obviously. They're -- they're hand printing, you
14 know, but it -- but it works.

15 But someone was in line and was anxious and
16 ended up leaving at that point and saying, well, I'll
17 come back because it's taking too long, but went
18 outside and misrepresented to the people out in the
19 line that all of the machines are down and nobody's
20 voting. And so, some people did -- did exit, leave
21 that line, was like, why should I be here. Because,
22 again, misinformation.

23 But number two, we have a backup. This --
24 this -- the county, the State, has said that when you
25 are a vote center county, we are required by law to

1 post a map with the four closest vote centers to that
2 property so that they can go -- if -- again, if, you
3 know, these people got out of line, you know, they
4 could get to another site within five minutes because
5 every single one of our sites has the four nearest.

6 Q. Do you have any estimate as to how many
7 people either left the polling place or left the -- a
8 line as a result of the events you described?

9 A. Right. At that one location it was like 10
10 or 15 people.

11 Q. Okay. And do know whether and to what
12 extent those people actually voted either later at
13 that location or somewhere else?

14 A. Again, I can't answer that because we
15 didn't have them by name.

16 Q. And do you know whether the person who
17 provided the misinformation ultimately voted?

18 A. Yes, they did.

19 Q. Did Bexar County experience any shortages
20 of equipment or supplies on election day in
21 November 2022 beyond what you've already described?

22 A. No, sir.

23 Q. Did Bexar County experience any shortages
24 of election personnel on election day in
25 November 2022?

1 A. Yes. Yes.

2 Q. Could you describe those.

3 A. Again, I think as we talked earlier, a poll
4 site -- a poll site here in -- in Texas, is required
5 to have a minimum of three people. We have a
6 presiding judge, an alternate judge and then a clerk.

7 And again, if we're expecting 500 people to
8 go there or a thousand people to go there, we assign
9 additional clerks. So, they could have upwards to
10 five clerks. So, you'd have seven workers there.

11 And in the course of the day, as the
12 election officials watch the increase because of
13 poll -- vote centers now, they were calling us asking
14 us to send them additional help. And of course we
15 had a cadre basically sitting here on the shelf ready
16 to assign.

17 So, yes, we continually send additional
18 poll workers out. Was that a shortage? Technically,
19 I don't think so, but it could be perceived as some
20 as if -- you know, if people were in line and here
21 comes a poll worker and at 2 o'clock in the afternoon
22 they could assume, well, you know, they've been
23 working all day and they were down one. But again,
24 please understand that it ramps up as-needed. We --
25 we sort of keep it as an even flow.

1 Q. Were any voters who were otherwise eligible
2 unable to vote on election day in November 2022
3 because of any personnel issues at the polling
4 places?

5 A. Not to my knowledge.

6 Q. Were any voters required to wait
7 significant additional time because of any shortages
8 or problems with election personnel on election day
9 in November '22 -- 2022 in Bexar County?

10 A. Not to my knowledge.

11 Q. On election day 2022 in Bexar County, were
12 there any reports of violations of election laws that
13 came to your attention?

14 A. Quite a few.

15 Q. Okay. Could you describe those generally.

16 A. The main focus, the main, sort of, thorn in
17 the side was Texas election code, Texas law, does not
18 permit voters to use their cell phones, technology,
19 in the poll site or within a hundred feet of the
20 building.

21 And we're at a stage right now where it's
22 sort of the election officials against the younger
23 voters. And what I mean by that is, obviously,
24 anybody, you know, probably in their 30s or down
25 their lives are on their cell phone. And as they

1 step to the qualifying table, they are asked to
2 produce a photo ID here in Texas and everybody uses
3 their driver's license.

4 And so, we had numerous young -- younger
5 voters who would hand their cell phone over because
6 they have their driver's license on their cell phone,
7 and we cannot accept that. We cannot accept that.

8 And so, they would have to go back out to
9 their car if in fact they had it. And there were
10 tons of complaints on that because, you know, we
11 haven't joined the -- the new technology.

12 And so, I would be naive to say there were
13 no complaints, because we chased that all day long.

14 Q. Were there any other reports of alleged
15 violations of any election laws in Bexar County on
16 election day in November 2022 that you're aware of?

17 A. The second most common call that we took
18 was on the outskirts of the Texas law. Because Texas
19 law, our -- our oversight at our poll sites stops at
20 the 100-foot distance marker.

21 But again, this election, November of 2022,
22 was so partisan. This one was -- was unbelievably
23 partisan. And so, we had numerous voters that called
24 all day long because they felt threatened and they
25 felt harassed by poll campaign workers that were

1 outside the 100-foot mark that would talk in a
2 threatening way to them, or this or that.

3 And so, they were calling us asking us to
4 make them go away. And so, that was our second most
5 call. And of course, our -- our hands are tied on
6 that because it's outside the 100-foot mark.

7 But when it got -- we had a couple polls
8 where it was very extreme. And so, we would send the
9 sheriff out just to make sure that they were staying
10 outside the 100-foot mark. And -- and we did have a
11 couple of our sites that the election officials were
12 having so much trouble with keeping the robust
13 campaign workers outside the 100-foot, they kept
14 coming into it, that they would call.

15 And again, how we staff our technicians,
16 dare I say they have a can of spray paint and they
17 spray paint the 100-foot mark on the grass or
18 whatever so that they can abide by that.

19 So again, that -- that was a constant
20 throughout the day. Was it a violation of election
21 law? You -- you all would have to decide that.
22 That's not technically, but it was huge.

23 Q. When you refer -- when you refer to that,
24 are you talking about the threats or harassment?

25 A. Yes.

1 Q. Or are you talking about the sometimes
2 coming within a hundred feet or both?

3 A. All of the above. Yes, sir.

4 Q. Okay. Were there any other reports of
5 violations of any election laws in Bexar County on
6 election day in November of 2022 that you haven't
7 already described?

8 A. No. Again, not -- not violations, but we
9 had a -- a number of our election officials feeling
10 very uncomfortable because the law had changed that
11 was now allowing poll watchers inside the -- you
12 know, designated poll watchers to have free access or
13 to be moving about in their poll site.

14 And so, of course, you know, we told them
15 that was -- that was part of the new law, and as long
16 as they didn't interact with the voters. But that
17 they -- that was their first time to really effect
18 that. And so, a bunch of them would just call us for
19 direction.

20 Q. I'll ask you some more questions about poll
21 watchers a little bit later. But are you aware of
22 any other alleged violations of any election laws in
23 Bexar County on election day on November of 2022?

24 A. Again --

25 Q. Other than those you've already described.

1 A. Well, right. But I mean, it's a myriad of
2 things. I mean, when you go back and look through
3 it, I mean, we would get phone calls that our
4 election signs had been taken down.

5 And so, again, people were angry with us
6 because, again, here in Texas we have a very, very
7 robust curbside voting process, and people would go
8 remove those signs. And we have it set up as a
9 designated area where, then, the voter can vote in
10 the comfort of their own car.

11 And so some people would, I guess, think it
12 was cute to remove the signs. And so then we would
13 get a call from someone who was going to take
14 advantage of that and they would call our office to
15 say there was no -- no -- no sign, it didn't have a
16 sign there.

17 Q. When you refer to signs there, are you --
18 are you -- are you referring to signs that describe
19 where curbside voting is available?

20 A. Yes. It's -- it's a large sign that...

21 Q. To the best of your knowledge, did Bexar
22 County fully comply with the provisions of SB-1 on
23 election day in November of 2022?

24 A. Yes, sir.

25 Q. To the best of your knowledge, did Bexar

1 County comply with all election laws, including but
2 not limited to SB-1 on election day November 2022?

3 A. Yes, sir.

4 Q. To the best of your knowledge, was there
5 anyone who was unable to vote in Bexar County on
6 election day in November 2022 because of SB-1 or any
7 of its provisions?

8 A. In person?

9 Q. Yes.

10 A. No.

11 Q. Do you know of anyone who was dissuaded
12 from voting on election day in November 2022 because
13 of SB-1 or any of its provisions?

14 A. No, sir.

15 Q. Okay. Let's talk about early voting.

16 A. (Coughs.) Excuse me.

17 Q. Did you have any major issues or problems
18 with the early voting process in Bexar County on
19 election day in November of 2022?

20 A. Are we speaking of early voting in person?

21 Q. Early voting in person.

22 A. Or early voting sites?

23 Q. Yes.

24 A. No. Again, I mean, other than we talked
25 about on -- on election day. I mean, all of that,

1 from the phone calls, to the -- all hit that same
2 model. For early voting, they had the same issues.

3 Q. Were there any changes in Bexar County's
4 election procedures with respect to early in-person
5 voting in October or November of 2022 as compared to
6 the primaries in early 2022?

7 A. No, sir.

8 Q. Did you become aware of any reported or
9 alleged violations of election laws in connection
10 with early in-person voting in Bexar County in
11 October or November of 2022?

12 A. No, sir.

13 Q. Did Bexar County experience any significant
14 problems with technology, supplies, equipment or
15 election personnel in connection with early in-person
16 voting in October and November of 2022?

17 A. We had one exception to that, sir.

18 Q. Please explain that. What occurred?

19 A. It -- it's -- it's one of the things that
20 you just, sort of, wouldn't believe it if you hadn't
21 seen it.

22 As the voters had cued up and were coming
23 in, there was a woman that was in a motorized
24 scooter, and as she came up to the qualifying table,
25 she did not apply the brakes and she ran right into

1 the table and up-ended the table and the laptop and
2 the printers and caused quite a...

3 So, that -- that took about 15 minutes for
4 them to take a deep breath and realize that they
5 could re-hook everything back up and that it would
6 work.

7 So, if that qualifies as a problem or an
8 issue, that was the one really exception that, yes,
9 somebody could have said, oh, we can't go in there.
10 Everything's on the floor. But again, it was
11 rectified in a timely manner.

12 Q. And was that a scooter accident or an
13 intentional ramming of the -- of the election -- the
14 qualifying table?

15 A. Everyone -- everyone was so startled they
16 didn't -- they didn't make the difference --

17 Q. Okay.

18 A. -- but it was like...

19 Q. And approximately when in the early voting
20 process did that occur?

21 A. This was about six days into it by the time
22 we got on the weekend.

23 Q. Did Bexar County fully comply with SB-1 and
24 its provisions in connection with the early in-person
25 voting process in October and November of 2022?

1 A. Yes, sir.

2 Q. Was there anyone who was unable to vote
3 early and in-person due to any provisions of SB-1
4 during October and November of 2022 in Bexar County?

5 MS. CUBRIEL: Objection; form.

6 THE WITNESS: Not to my knowledge.

7 Q. BY MR. BRYANT: Are you aware of anyone who
8 was dissuaded from voting early in person due to any
9 provisions of SB-1 during the October and November
10 2022 general election period?

11 A. No, sir. Not to my knowledge.

12 Q. And to the best of your knowledge, did
13 Bexar County fully comply with the provisions of SB-1
14 with respect to the early voting process in October
15 and November of 2022?

16 A. Yes, sir.

17 Q. Okay. Now, are you in charge of -- overall
18 charge of the selection of the polling places or
19 vote -- voting centers in Bexar County for the
20 general election both on election day and early
21 voting?

22 A. Yes, sir. I mean, it's -- it's sort of a
23 community issue. It's -- you know, it's not done as
24 an emperor or just sitting there. I mean, we have
25 joint -- for instance, we have joint elections and

1 even in November we get.

2 So, if we have a school district that is
3 holding an election and a bond election and they want
4 to have an early voting site in their administration
5 building, we will add that.

6 And so, you know, please understand it's
7 done by committee, as far as that, by the entities
8 that are on that ballot.

9 Q. Were there any changes in the polling
10 places or vote -- voting centers for Bexar County for
11 the general election in 2022 from the primary
12 elections in March of 2022?

13 A. Yes, sir.

14 Q. What were the reasons for those changes?

15 A. Our commissioner's court felt that we were
16 not utilizing the full sites that they wanted. And
17 so, when politics entered into it, they had us add
18 early voting sites at all of the colleges and
19 universities. And on election day, they had us add
20 25 sites that -- that they chose and felt that we
21 should be present at.

22 Q. Were there any other reasons for changes in
23 those sites in between the first half of 2022 and the
24 general election?

25 A. There -- there one -- there may be one

1 other site, sir. We have a fantastic relationship
2 with the City of San Antonio. And so, when they open
3 a library, a public library, we're there.

4 Well, a few years ago the City of
5 San Antonio passed a bond election. And the bond
6 election was for remodeling of their libraries. And
7 so, we had issues -- I hate that word. We had issues
8 with one of their time schedules on their library.
9 We were to be able to be moved back into Memorial
10 Library. And due to supply chain issues, they didn't
11 open. They -- they didn't complete their work in
12 time.

13 So at the last minute, where we thought we
14 would be at Memorial Library, we had to go back to
15 our alternate site of West Point. So, it's issues
16 like that that we just take it right up to the wall
17 because we -- we -- the voters know to go to Memorial
18 Library. So, we had to post a big sign and move them
19 on.

20 Q. Did you become aware of any complaints in
21 connection with the general election in November of
22 2022 regarding the number or distribution of polling
23 places or vote centers?

24 A. Yes, sir.

25 Q. Could you describe what you became aware

1 of?

2 A. I'm -- I'm respectful of the fact, and we
3 have to keep ever most in our mind, that on May 24th
4 we had the shooting in Uvalde. And so here in Bexar
5 County, 68 percent of our poll sites are in schools,
6 and the schools didn't want us. They -- after --
7 after the Uvalde, you know, the horrendous shooting
8 over there, they didn't want the elections to be
9 on-site when the students were there.

10 So, we met with Region 20, which is our --
11 all of our school districts, and we had some great
12 leadership. We have 13 different school districts in
13 Bexar County, and we had great leadership from some
14 of ours, and they chose to make election day an
15 in-service day so there would not be students. So,
16 for a portion of our normal sites we were --
17 everything was fine.

18 But for the school districts that chose not
19 to make it an in-service day, the students were
20 there. And so, what happened in a few of our sites
21 is, now we're trying make amends. You know, they --
22 they want to keep the students safe. We need to say,
23 and of course, they can't refuse us if we ask them.

24 And so, the accommodation was, okay,
25 instead of putting you in the foyer where, you know,

1 you pull up and you go in and you're right in the
2 foyer, we're going to put you back around into the
3 gymnasium or we're going to allow you to have access
4 to the library.

5 So, that complied with it, so we have the
6 voting site there. But what we ended up finding out
7 was, for a lot of our senior citizens and a lot of
8 our ADA, the longer walk then became problematic.
9 They did it, but then we took calls of they -- you
10 know, weren't -- why did we do it? Why did we move
11 it there? And so, again, lessons learned.

12 So, you know, we went back and have worked
13 with the school districts. And so, with the
14 legislative session up there now, we are hoping and
15 praying that they will mandate that election day is a
16 school holiday or an in-service day because there
17 shouldn't be that angst.

18 Q. Are you aware of anyone who was unable to
19 vote or was dissuaded from voting on election day in
20 November of 2022 in Bexar County because of the issue
21 that you just described?

22 A. No.

23 Q. Okay. Let's talk about mail-in ballots.

24 A. Uh-huh.

25 Q. Have there been procedure changes since the

1 primaries in the first half of 2022 with respect to
2 mail-in ballots in Bexar County that were in place in
3 connection with the general election in November of
4 2022?

5 A. Huge changes.

6 Q. Okay. Could you generally describe those.

7 A. SB-1 when it was first rolled out,
8 obviously, for the primary, came very late into our
9 world. And I had just said the supply chain issue.
10 We -- SB-1 mandated that we needed all new election
11 envelopes and all -- everything new because of the
12 requirement and the language and -- and the ID and
13 the ID requirements and the perf lines on them.

14 And so, we -- we managed to get -- we got
15 them at the 11th hour, but we did it and it caused us
16 stress and the voters were anxious because their
17 ballots weren't getting there.

18 So -- and we had a number of our voters in
19 March and -- and May that their ballots were
20 rejected, the applications were rejected, because
21 SB-1 required either the TDL or the SSN.

22 And I would like to remind you that most of
23 our voters by mail are senior citizens who registered
24 years and years ago when it was not required to give
25 either an SSN or a TDL.

1 So, the way the law was written is, the
2 ABBM had to have one of those numbers and we had to
3 match one of those numbers with the original voter
4 registration card, well, we couldn't do it. We
5 didn't have it. We didn't have it on record.

6 And so then we would -- as we rejected it,
7 we had to send them a new ABBM and a new voter
8 registration card so that they could send it back and
9 update their records.

10 Well, as -- as you know, I mean, I'm not
11 going to go back and beat a dead horse. But that
12 procedure, because of the problematic rollout of it,
13 was worked on and worked on and worked on, and the --
14 the State was able to work with DPS somehow and we
15 were able to get...

16 I'm not technical, but they were able to
17 take all of our voters and mash them against DPS and
18 get the license numbers, or TDLs for a number of our
19 voters. So, by the time we were into the May
20 elections, we had a much more robust database. And
21 so, we were able to make these matches much -- much,
22 much better.

23 And then there was a court case that the
24 State lost that required the language on the
25 envelopes that we had to be changed. Again, now

1 we're problematic. We have -- we have the old ones.
2 And so, do we sit there with a Sharpie and black out
3 all of these or do we order more?

4 And so, again, I mean, we're not the only
5 county that was doing this. I mean, everyone was,
6 sort of, you know, really, really pushing it and it
7 worked. I mean, we were -- we were able to do it.

8 I think the blessing in all of this is that
9 in 2022, which is, you know, the gubernatorial
10 elections, those election have --

11 Q. You're talking about the general elections?

12 A. General elections from the primary, that
13 whole year is much smaller than a presidential year.
14 And so, you know, we had 40,000 mail ballots, mail
15 ballot applications in 2022. Where in 2020, we had
16 124,000. So, again, you can see that it was an
17 economy of scale, and we were much -- it was much
18 easier to manage the -- the economy of scale that we
19 did. But it was -- it was strenuous.

20 Q. Have you described all of the changes that
21 occurred in the -- the mail-in ballot procedures
22 between the primaries in the first half of 2022 and
23 the procedures that were in place for the general
24 election in November -- in October of 2022 in Bexar
25 County?

1 A. Yes.

2 Q. Okay. And what was the overall effect of
3 the changes as you observed them in October and
4 November of 2022 as compared to the previous -- the
5 first half of 2022?

6 A. I -- I'm proud to say that -- that the
7 changes that we effected here in Bexar County we did
8 a lot of it on our own from our media outreach, to --
9 to -- I'll show you how we -- we developed an insert
10 for the ballot. I mean, we did a lot of outreach on
11 our own, and we had a much, much higher success rate
12 in November. So, it was -- it was a huge relief.

13 Q. And when you refer to a success rate, could
14 you explain what you mean by that.

15 A. Well, again, in -- in every -- in every
16 election, in the mail balloting process, we'll send
17 out -- I mean, let's just say on this one, like,
18 we'll send out 40,000. And when it's time to
19 actually count the mail ballots, you're down to
20 30,000, 30-, 32,000.

21 And to a layperson out there, they're like,
22 where did the other ones go? Well, you sent out this
23 many, why don't you have this many back? Well, human
24 nature enters into it a lot.

25 And about probably anywhere eight to

1 10 percent of the people who get a mail ballot will
2 return that mail ballot and go vote in person because
3 they use that mail ballot as a sample ballot. We
4 have issues with that because, obviously, the mail
5 ballots cost a lot of money, time, you know, people.
6 Anyhow, I won't go into all those details. So, we
7 don't get those back.

8 Then you have the ones that are mailed in
9 that are rejected for obvious reasons. You know,
10 they didn't sign it. They signed -- what we see in a
11 number of things is, a husband and wife will each get
12 their ballot, but when it comes back in to us, the
13 husband has signed the wife's ballot and vice versa.
14 And so, those have to go out and be rejected to come
15 back so that we have the right signature with the
16 right ballot.

17 So, there's any number of reasons why this
18 happens. And in any normal election, we're going to
19 get a reject rate of three percent, four percent.
20 That's normal for -- for any election for us. But
21 when we did November 2022, with all of our extra
22 attention to it, we had a 1.7. So we were, like,
23 yes.

24 Q. You had a 1.7?

25 A. Rejection rate.

1 Q. Okay. And could you define what you mean
2 by "rejection rate."

3 A. Again, the rejection rate is when -- no --
4 no matter -- they send in their ballot. They
5 obviously have marked that ballot. They want their
6 ballot to count. That goes to the ballot board and
7 they'll open it and there's no signature. They --
8 they, you know, took the perf off and there's no
9 signature there.

10 So if time allows, then this ballot board
11 with SB-1 will mail that ballot back to them in
12 another envelope, say sign it and get it back to us
13 if there's enough time. If the TDL is not there,
14 yes, it's entered we don't have an identifier. Those
15 go back if they have time.

16 SB-1 allows them to make phone calls to
17 call the voter and say, be on the lookout, it's
18 coming. Or they can e-mail them, if there was an
19 e-mail address to say, be on the lookout, it's
20 coming. So, in the normal course that back and --
21 back and forth, back and forth.

22 The legislature listened to us about six
23 years ago and we now are permitted to count the mail
24 ballots that arrive the day after the election if
25 they've been postmarked by 7:00 election night. So,

1 we see those in.

2 But the rejection rate is that percentage
3 of, we don't see -- we -- we got it. They're the
4 ones that we never -- we didn't get them back. We
5 sent them out. We knew it had no signature on it,
6 didn't make it back to us. So, that person attempted
7 to vote, but then they were rejected.

8 Q. So, if someone sends in a ballot by mail
9 without a signature and there's an attempt to give
10 them an opportunity to vote again --

11 A. Yes, sir.

12 Q. -- but they don't send in the mail ballot
13 with the signature, is that counted as a rejection?

14 A. Ultimately, yes, sir.

15 Q. Okay. If someone sends in a ballot by mail
16 but it arrives three days late, is that counted as a
17 rejection?

18 A. No. No, sir. That's just nontimely.

19 It's --

20 Q. Okay.

21 A. It's not in the rejections.

22 Q. And is that true even if they initially
23 send in --

24 A. Right.

25 Q. -- send in a ballot without a signature?

1 A. Correct.

2 Q. If I understand your testimony correctly,
3 you described that a mail-in ballot may be rejected
4 because of a number of different possible
5 shortcomings according to the law; is that right?

6 A. Yes, sir.

7 Q. And if that is -- if those shortcomings are
8 not fully corrected, my understanding is that those
9 will be counted as a ballot rejection --

10 A. Yes, sir.

11 Q. -- is that right?

12 A. Yes, sir.

13 Q. Do you have any way of knowing in Bexar
14 County how many or what percentage of the rejections
15 are due to a problem with, for example, a signature
16 as opposed to a Texas driver's license or a Social
17 Security number identification problem?

18 A. Yes, sir.

19 Q. And how do you know that?

20 A. By our vendor software. We -- and -- and
21 I'm sure you know, and I don't -- I don't want to
22 go -- again, go down the -- the rabbit hole. But
23 HAVA said that all states had to have a unified voter
24 database, a single database for each state. And
25 Texas has TEAM, T-E-A-M, Texas Election

1 Administration Management system.

2 And when that system came online back in, I
3 guess, 2002, '5, somewhere in there, it -- when they
4 turned it on, we have 254 counties and it immediately
5 crashed because the large counties, the -- the Harris
6 and us and El Paso, we call ourselves the big boys,
7 have 75 percent of the registered voters in the whole
8 state. But the system couldn't handle us being on it
9 real time, so we all had to go out and get a
10 third-party vendor.

11 So, we have a company called VOTEC that we
12 use. And what happens is, the work product that we
13 do every day resides in our building. Our servers
14 are there. We do everything. We keep it in-house.
15 And then I have staff that at the end of the day or
16 the beginning of the next day, they take that daily
17 work product and they wrap it up, encrypt it and
18 shoot it up to the secretary of state's office. And
19 this is what the large counties are doing.

20 And then the secretary of state's office is
21 the only way someone can get registered to vote,
22 because they assign the VOA, the voter registration
23 number. And then that same person imports it, goes
24 back up grabs our file, put it back in our own
25 stationary file here.

1 So, because we have that vendor, we use it
2 for our mail ballots. We use it for our early
3 voting. It's a wonderful system. And they have
4 codes that we can put in for no signature, no
5 matching TDL, SSN. And we -- we have those codes
6 that come out.

7 And so, we can differentiate if -- if
8 needed to exactly how many didn't sign it, you know,
9 how many -- the -- we're still working on -- working
10 with the vendor to update the codes so that we can
11 capture more of the information from SB-1 on the
12 cure, not cured, you know.

13 We sent it by, we called them on the phone
14 or that detail's not in our system yet, so it's not
15 mat- -- it doesn't match up -- the State doesn't have
16 it in their system. So, this is a work in progress.
17 We're all learning and it's only getting better.

18 But again, there are third-party vendors
19 involved in, I think they said -- I think I'll
20 probably be wrong, but I think they said there were
21 31 counties that were not on TEAM real time. That
22 may have changed, but don't hold me to that 31.

23 Q. Is the information that Bexar County
24 captures on its software regarding the specific
25 reasons a mail-in ballot is rejected provided to the

1 State?

2 A. Yes. It -- it goes up every day in that
3 export and that import.

4 Q. Okay. You testified that the rejection
5 rate for Bexar County in the -- the general election
6 in November of 2022, if I understand correctly, was
7 approximately 1.7 percent?

8 A. Yes, sir.

9 Q. And my impression is that you take some
10 satisfaction in having gotten the number down to that
11 point; is that correct?

12 A. Absolutely. I'm so proud of my staff.

13 Q. How does that compare with the rejection
14 rate in 2020 in Bexar County?

15 A. Again, as -- as -- as I said, 2020 had a
16 higher rejection rate because just on the economy of
17 scale, when we're talking approximately 40,000 in
18 2022, but 124,000 in 2020, you can see you're going
19 to have a higher rejection rate based on -- you know,
20 the rejection's are the same no matter what election
21 you're doing.

22 If somebody doesn't sign their ballot, they
23 don't sign their ballot and that happens every time.
24 The only new thing this time was the TDL or the SSN,
25 the missing -- the missing information, but we have

1 those. We have those. And again, it's human nature.
2 If we have time to correct it, if the voter has time
3 to correct it, they can do it.

4 Q. What was the rejection rate in Bexar County
5 for 2020, if you recall?

6 A. I don't have that exactly, but I know it's
7 going to be in the three to four percent range.

8 Q. Okay.

9 A. I mean, that -- that was like our happy
10 zone.

11 Q. What was your -- well, explain to me what
12 you mean by the "happy zone."

13 A. Again, if one person doesn't get to vote,
14 that hits us. I mean, that's what we do. But if
15 you've gone through and you've had, you know, 124,000
16 ballots mailed out and -- and you've counted 92,000
17 and these others have been, you know, brought back to
18 you and not -- they just sit them on the shelf,
19 that's a good feeling.

20 But again, when the reject -- rejected
21 rate -- and again, please understand that the
22 rejected rate comes from partisan people because
23 we -- the election's office handles the manual part
24 of it. You know, we print the ballots. We take the
25 applications. We data enter. We mail them. We

1 bring them back in. We scan them.

2 And then once they're back, they get turned
3 over to the early ballot board. And that early
4 ballot board is a group of people that are appointed
5 by the Democrat and the Republican party. They are
6 not our employees. They are independent -- an
7 independent body.

8 And so, once we turn these over to them,
9 they are the ones who will make the decision that
10 there's no signature, or this person didn't sign it,
11 that signature doesn't match, whatever that's that
12 group. And then that's where we get the rejection
13 rate, the final rejection rate.

14 Q. How did Bexar County's 1.7 percent
15 rejection rate in the general election in 2022
16 compare to the rejection rate in general election
17 years prior to 2020?

18 A. It was less. It was less. I -- I can't
19 give you a number. I didn't do all the data mining,
20 but we can find it out.

21 Q. Can -- can you say that it was
22 significantly less?

23 A. It -- you know, I would feel like if you're
24 looking at just raw numbers it would appear to be
25 down 50 percent. But the difference between a three

1 percent rejection rate and one percent is -- is not
2 that much. So, it's hard to put a numeric value on
3 that.

4 Q. Okay. Now, earlier in your testimony you
5 described a -- a process, I believe, whereby mail-in
6 voters, especially over-65 voters, make applications
7 annually?

8 A. Yes, sir.

9 Q. Okay. Is -- are the amount of the annual
10 applications increasing in Bexar County, say from
11 23 -- 2023 as compared to 2022?

12 A. No.

13 Q. How -- how are -- is that number moving
14 over time?

15 MS. CUBRIEL: I'm going to object to --

16 Q. BY MR. BRYANT: The number of annual
17 applications that you receive in Bexar County --

18 MS. CUBRIEL: I'm going to object.

19 Q. BY MR. BRYANT: -- for mail-in voters?

20 MS. CUBRIEL: I'm sorry. I'm going to
21 object because I think you're going beyond the scope
22 of the amended scheduling order, getting too far away
23 from asking her about matters related specifically to
24 the general election that just passed.

25 MR. BRYANT: You can answer --

1 MS. CUBRIEL: You can answer if you know.

2 Q. BY MR. BRYANT: You can answer unless she
3 instructs you not to.

4 A. What came -- what came to mind from your --
5 from your question is, the annual applications. We
6 have State-prescribed annual applications. But in
7 the difference of -- and -- and I know we talked
8 about it before, that we refer to it as a last like
9 election. So, if I compare the '18 to '22, the by
10 mail and then the presidential elections are much
11 higher.

12 But please understand that candidates,
13 candidates hire consultants and consultants handle
14 their by mail. And so, the consultants have all
15 become very astute at making their mail ballot
16 applications annual applications.

17 And so, we see a huge influx of annual
18 applications in a presidential year. We see a lot.
19 Then, like I said, a third of them will come in on
20 the governors, the -- the other general. This year,
21 which is the odd year and it's just municipal
22 elections, they're almost nonexistent.

23 I mean, as -- as I -- as I came over today,
24 I looked, we have 854 in with an election coming up
25 next May 6th. So, it -- it -- that's things that

1 just -- I can't give you a -- I can't give you a
2 definite answer because there's too many variables.

3 Q. Thank you. Another subject. You had
4 mentioned earlier in your testimony some inserts that
5 were done. Could you describe more fully for
6 somebody who doesn't understand that what Bexar
7 County did --

8 A. Right.

9 Q. -- in 2022 with respect to inserts.

10 A. I'm going to scream if I didn't -- here
11 they are. We -- this went through many iterations of
12 planning. When SB-1 was rolled out, the secretary of
13 state wrote an insert for the ballots for us to
14 include in all of the ballots. But it was a complete
15 eight-and-a-half by 11 page with a lot of legalese on
16 it, and in the form, and the voters just didn't read
17 it. They just -- I mean, when you sending them
18 stuff, they're looking for their ballot. They just
19 didn't read it.

20 So, when we had our, like I said,
21 unacceptable high rejection rate, we said, huh-uh,
22 can't do that. So, we said we're going to start with
23 this. And this has gone through, like, three
24 iterations of it. We -- we -- we did -- first, we
25 did one in black and white, and that didn't jump out

1 at them. And then we did one that had duller --
2 duller colors on it, and that didn't jump out at
3 them. We did it in -- in May.

4 And by November, we had passed this around
5 to everybody and said, you know, is this going to
6 jump out at them? And -- and then what we did
7 specifically, and this is sort of a catch-22 because
8 I'm really proud of it, but part of me says, this was
9 evil Jackie, because we specifically made it small
10 and a quarter sheet so when they pulled all their
11 stuff out of the envelope, this would hopefully fall
12 on the floor so that they had to see it. And --

13 Q. You tried --

14 A. -- and --

15 Q. You tried to make it as attention-getting
16 as possible?

17 A. Exactly. Exactly. And we got to a 1.7
18 rejection rate.

19 Q. Okay. Now --

20 MR. GENECHIN: David, I don't want to
21 interrupt the witness, but I would like to request
22 that you mark the document that Miss Callanen has
23 brought as an exhibit.

24 MR. BRYANT: I'll be -- be happy to do
25 that.

1 MR. GENECHIN: Thank you.

2 MS. CUBRIEL: This is counsel for Bexar
3 County. I just want to say, at her last deposition,
4 she brought an earlier version of the form --

5 THE WITNESS: Uh-huh. Yes.

6 MS. CUBRIEL: -- that was an exhibit. And
7 so, our intent, and why I had her pull it out is, we
8 do wish to make this an exhibit because this is the
9 updated version.

10 MR. BRYANT: Okay.

11 THE WITNESS: It worked better.

12 MS. CUBRIEL: Yeah.

13 MR. BRYANT: Right.

14 MS. CUBRIEL: And can you pass those extra
15 ones down.

16 MR. BRYANT: I will do that.

17 (Exhibit 9 was marked.)

18 Q. BY MR. BRYANT: Miss Callanen, let me show
19 you what was marked Exhibit C at an earlier
20 deposition that you gave in this case, and I've
21 marked it as JC3, Exhibit 9.

22 A. Uh-huh.

23 Q. Can you describe what that is.

24 A. This is an earlier version of -- of what we
25 have there. And again, black and white. And you can

1 see, if you want to just -- to make the difference on
2 it, when we did it this time, we wrote on here. It
3 says, "Under the flap on your teal envelope." But we
4 took "teal" off. We didn't -- people want to mess
5 with what the color was.

6 So the new ones just say, "Under the flap."
7 So, again, we just -- again, in our office, we use it
8 for not -- we were, like -- can I -- dare I say, we
9 were dumbing it down. We wanted to make it as simple
10 as possible, so we took out extra -- I think, she
11 wants to see it.

12 MS. PAIKOWSKY: Would you mind if I see it?

13 MR. BRYANT: Absolutely.

14 MS. PAIKOWSKY: Thanks so much.

15 Q. BY MR. BRYANT: And the -- Miss Miss
16 Callanen are all -- you -- you handed me three --

17 A. Here's another one.

18 Q. -- examples. Are those all the same?

19 A. Yes, sir.

20 Q. Okay.

21 A. That's all I brought.

22 MS. PAIKOWSKY: And if it's helpful, I
23 actually have a color version of the previous
24 exhibit.

25 MR. BRYANT: That's great. Okay.

1 THE WITNESS: Yeah.

2 MR. GENECHIN: Are we going to mark this?

3 MR. BRYANT: Yes, we will. I'm just trying
4 to figure out what number I have not yet used.

5 (Exhibit 13 was marked.)

6 Q. BY MR. BRYANT: All right. Miss Miss
7 Callanen I'm handing you what's been marked as JC3,
8 Exhibit 13. Could you describe what that is.

9 A. Yes, sir. This is the insert that we used
10 for the November 2022 mail ballots.

11 Q. Okay. And the -- the earlier exhibit that
12 I showed you which is marked JC3, Exhibit 9, and also
13 Exhibit C to your earlier deposition, when was that
14 one in use?

15 A. The black and white one came into use for
16 the May elections, the city and school elections.
17 Then the colored one came into use where it says the
18 teal, that was for the primary runoff, which was also
19 at the end of May. So May --

20 Q. May of 2022?

21 A. -- of '22. Yes, sir. We had the primary
22 in March, and then we had the city and school
23 elections the first Saturday, and then we had the
24 primary runoff at the end of May. And so then in the
25 next couple of months, then we went back and did

1 another deep dive on it and we think this is simpler.
2 We -- we changed it a little bit.

3 Q. And when you say, "this," you're referring
4 to JC3, Exhibit 13?

5 A. Yes, sir.

6 Q. Okay.

7 A. I'm sorry.

8 Q. It's just -- it's often a written --
9 written process, so we got to refer to exhibits. Did
10 you observe in -- in Bexar County, in connection with
11 the November 2022 general election, changes in the
12 level of voter understanding of the mail-in voting
13 process?

14 A. Absolutely.

15 Q. Could you describe what you observed in
16 that regard.

17 A. Again, anecdotally, if you want to say,
18 number one, you know, the reject rate proves that --
19 that we did see that.

20 But number two, in the course of the
21 election, we noticed that we were having a lessening
22 of the phone calls where they were asking for
23 assistance. You know, that -- but again, we were
24 doing major media. We were doing handouts
25 everywhere. We had handouts out at the early voting

1 sites. We -- we were -- we just sort of threw
2 everything at it that we could because it was just so
3 important.

4 Q. Okay. You were describing some media
5 outreach and voter education efforts that occurred in
6 connection with the November 2022 general election;
7 is that right?

8 A. Yes, sir.

9 Q. Were those efforts that were made
10 specifically in and by Bexar County or were they a
11 broader effort, or both?

12 A. We, the election's office, had our own
13 outreach. But again, members of my commissioner's
14 court entered into it and they did their own outreach
15 for it also, separate and apart from the elections
16 office.

17 Q. Okay. Could you describe as -- as much as
18 you recall, the media outreach that was done to
19 educate voters about mail-in balloting in connection
20 with the November 2022 general election process in
21 Bexar County.

22 A. Sure. I mean, we -- we did press
23 conferences twice a week. We did, again, outreach
24 everywhere we went, every -- every presentation we
25 put on, every meeting we went to. We worked with the

1 AARP. We worked with Oasis. We -- we did outreach
2 with the organizations that -- that go to the senior
3 citizens to -- to try and -- we worked very heavily
4 with the disability community. In fact, we're still
5 working with the disability community at this time.
6 So, we -- we -- we just tried to do as much as we
7 could.

8 Q. And during what period of time were those
9 efforts undertaken with respect to the November 2022
10 general election process?

11 A. They started the middle of September
12 through Novem- -- November. Because, again, the
13 middle of September is basically, again, for us is
14 when that's the go button, because we all have to
15 abide by the MOVE Act, which is the federal military
16 MOVE Act, and that's always 45 days before an
17 election. So, once our ballots go out, it's --
18 somebody's hit the go button.

19 Q. Did Bexar County comply with that 45-day
20 requirement in connection with the general
21 election --

22 A. Absolutely.

23 Q. -- in 2022?

24 A. Absolutely.

25 MR. GENECHIN: David, would this be a good

1 time for a break?

2 MR. BRYANT: Certainly. Let's take a
3 break.

4 THE VIDEOGRAPHER: Time is 10:21.
5 Correction, 10:28 a.m. and we are off the record.

6 (A brief recess was taken.)

7 THE VIDEOGRAPHER: Time is 10:38 a.m. and
8 we are on the record.

9 Q. BY MR. BRYANT: Miss Callanen, you were
10 testifying before the break about outreach and voter
11 education efforts that were made in connection with
12 the November 2022 general election. And it sounded
13 to me as if those were fairly extensive and ramped up
14 from previous elections; is that correct?

15 A. Yes, sir. Yes, sir.

16 Q. Do you anticipate looking forward that
17 it'll be necessary to continue to increase and
18 increase the level of effort and expense that Bexar
19 County does on -- on voter education and outreach?
20 Or do you believe that over time the need to do that
21 will level off or decline as people understand better
22 the -- the procedures?

23 MS. PAIKOWSKY: Objection; form.

24 THE WITNESS: I -- I understand your
25 question. I -- again, this is an odd number year, so

1 we will have so many less people. And I think we
2 will have to duplicate our media outreach for 2024.
3 Because, again, you keep hearing me say we had 40,000
4 now and 124,000. So that, to me, is there's another
5 80,000 that have not used the new method.

6 So, we're going to stay attuned to that and
7 stay focused on that. So, I expect that when we get
8 to the 2024 we'll duplicate what we've done.

9 Q. BY MR. BRYANT: Okay. Do you have any
10 expectations on that subject beyond 2024?

11 A. No, sir.

12 Q. Okay. You testified earlier about efforts
13 that your office makes to contact people whose
14 mail-in ballots have initially been rejected. And I
15 believe you indicated that sometimes that's by
16 e-mail, sometimes that's by phone.

17 Could you describe the extent and
18 regularity of those efforts that were undertaken in
19 connection with the November 2022 general election.

20 A. Yes, sir. Well, in SB-1 it opened up the
21 door for us to be able to have outreach so that they
22 could cure their -- their ballots, that's the phrase
23 we use, they could cure their ballots. And they
24 opened up the avenue of the phone and by e-mail as
25 opposed to sending them the hard copy reject and

1 here's your envelope, sign it and send it back to us,
2 that we had previously done.

3 And again, as you heard me say that when
4 the ballots are in the position of being rejected,
5 the final authority, so to speak, is that early
6 ballot board, the group of partisan people. So, we
7 had to install phones in -- in that room for them,
8 set up other computers so that they could e-mail the
9 people back and forth. And they did it. They --
10 that group unto itself, did it. So, I can't give a
11 solid number on -- on what that was.

12 Q. Did that group do it in addition to your
13 staff?

14 A. Our staff did it in the beginning -- if --
15 if a ballot came back in and we could obviously see
16 it wasn't signed, then we immediately took it and
17 sent it back and said, sign it and then send it back
18 in.

19 But as far as the perf, there's -- there's
20 a flap on this designed envelope that has to be
21 peeled down and the number's there, are obviously for
22 identity theft. It was designed that way so that the
23 SSN or the TDL are under this removable flab.

24 And the early ballot board removed the
25 flap. So, they were seeing this number, this number,

1 but we would catch the signatures.

2 Q. Okay. And did your staff contact any of
3 the voters whose initial mail-in ballots were
4 rejected by e-mail or phone?

5 A. We did not.

6 Q. Okay. I believe your testimony was that
7 there were -- are instances in which an initial
8 mail-in ballot may be rejected for multiple
9 reasons --

10 A. Yes, sir.

11 Q. -- is that correct?

12 A. Yes, sir.

13 Q. When that occurs, how does your office code
14 that to indicate that there was more than one reason
15 for the -- for the initial rejection?

16 A. Understood. We have, for lack of a better
17 term, a generic rejection sheet and saying that, you
18 know, your ballot -- the ballot has been rejected,
19 please review. And then it's one, two, three, four,
20 five, six, seven, and we check off the ones that
21 matter, you know. And so, it's -- it can be used to
22 your point for the multiple uses.

23 Q. Okay. And how is that reported to the
24 State, that there were multiple reasons for
25 rejection?

1 A. Again, because of our vendor, we can't
2 check multiple reasons in our system. We can only
3 check one. And so -- and from that system to go to
4 the State, it's only going to say one. So as far as
5 the multiple ones, that's -- that's the procedure we
6 do. That's how we're hoping to help this, but
7 there's no way to track that at this point.

8 So, again, our -- our goal is to have our
9 vendor and the State sit down and talk to each other
10 and see if we can do lessons learned and we can put
11 some new codes in there that we can use.

12 Q. Is it possible that in connection with the
13 November 2022 general election there were mail-in
14 ballots that were rejected for multiple reasons?

15 A. Oh, yeah.

16 Q. For example, a signature issue and a ID
17 number mismatch and that those were reported on the
18 software as ID number mismatch only?

19 A. Correct.

20 Q. So, is it possible that even if that ID
21 number mismatch had not occurred or had been cured,
22 that the vote still would have been rejected?

23 A. Under reason of signature or --

24 Q. Yes.

25 A. -- or no statement of residence? Yes,

1 sir.

2 Q. Okay. Do you know whether that in fact
3 occurred, and if so, how often?

4 A. I don't. I don't. Again --

5 Q. Is there any way to find that out at this
6 point?

7 A. I -- not to my knowledge, because it's
8 already been in the system.

9 Q. Okay. I want to ask you a few questions
10 about your experience with poll watchers in -- at the
11 November 2022 general election in Bexar County. Were
12 there any reported incidents that you know about of
13 confrontation or harassment by poll watchers of
14 voters?

15 A. I don't know that it would rise to the
16 level of harassment, but --

17 Q. What are you aware of?

18 A. -- I was -- yeah. As I previously said,
19 we had some voters go back to the officials and say,
20 you know, that person, that pollster is standing too
21 close to me. They can see how I'm voting. And, you
22 know, we had those comments come in. You know, we
23 had to continually send out, you know, that they have
24 access too, but they have to stay away from the
25 voters. They cannot see how the voters are -- are

1 voting.

2 But, yes, that -- that was a -- a new
3 dynam- -- dynamic that they were --

4 Q. Okay.

5 A. -- coming into.

6 Q. Approximately how many reports were there
7 of conduct of that sort in connection with the
8 November 2022 general election in Bexar County?

9 A. Obviously, we had more in early voting
10 because we have more vote -- voters show up. We
11 have, like, two to one on that, so. You know, it --
12 it was a daily occurrence.

13 It was -- I can't say that all 41 of our
14 sites it was a daily occurrence, but I know they
15 called us and -- what can we do? What can we do?
16 They're -- you know, and we're like, you're doing it
17 right. Make sure they're -- they have their badge
18 on. They're identifiable. If you need to remind
19 them that they have to -- you know, you're there for
20 the voter. So, I -- I can't put a number on it.

21 Q. Do you have any reason to believe that any
22 of the behavior of the poll watchers in connection
23 with that election in November of 2022 or the early
24 voting dissuaded any voters from casting their
25 ballots?

1 A. Not to my knowledge.

2 Q. Did you become aware of any other issues
3 with -- or problems with the poll watchers in
4 connection with the general election in 2022 in
5 Bexar County other than those you've described?

6 A. Yes.

7 Q. Could you describe those problems or
8 issues.

9 A. Or word, "issues"?

10 Q. Yes, I understand "issues" is not -- not
11 your favorite word or mine either, but I did use it.
12 So --

13 A. One -- one --

14 Q. -- my bad?

15 A. No, it's okay. One of -- as we did our
16 last -- you heard me use the After Action Report with
17 our officials.

18 Q. Yes.

19 A. A number of our election judges and
20 officials in the course of their duties, whether it's
21 closing down at night in early voting, locking
22 everything up, or it's opening that next morning or
23 on election day, it's running their tapes and
24 closing, the poll watchers, not -- not all of them,
25 but -- but there -- there -- a number of them were

1 slowing things down, in the official's opinion,
2 because they were not -- they get into a routine, the
3 judges and the staff, and they know who they can do
4 and how they can trust, and you can close this and I
5 can close this.

6 But the poll watchers there -- and for this
7 entire election in -- in November of 2022, they were
8 there and would, like, no, you can't close that yet.
9 I haven't written down the serial number. Oh, don't
10 touch that. I haven't done this.

11 And so, the election officials were
12 anxious. They were not as pleasant because they saw
13 the poll watchers as interfering with their duties to
14 comply and come down.

15 And then the other discomfort that we had
16 is, again, a number of these poll watchers had the
17 right to, and they took that right, to follow the
18 election officials in their cars. And the election
19 officials just weren't happy with that, weren't --
20 weren't happy with that.

21 Q. Were you aware of any revisions in the
22 training of poll watchers by the secretary of state's
23 office during 2022?

24 A. Not to my knowledge. We...

25 Q. I believe in one of your earlier

1 depositions you testified about the -- I would call
2 it a conference that election officials have with the
3 secretary of state's office in late July or August,
4 and that it was not possible to do that in 2021
5 because of --

6 A. COVID.

7 Q. -- the law was about to change. Is -- do
8 you recall that testimony?

9 A. Because of COVID, yeah.

10 Q. Yes.

11 A. Yes, sir.

12 Q. Did that conference occur in -- or about
13 the same time in 2022?

14 A. Yes, sir.

15 Q. Was there any impediment to that
16 accomplishing what it had accomplished in previous
17 years before 2021?

18 A. No. We -- the conference was held.

19 Q. Okay. And what, if any, beneficial effects
20 did -- did you perceive from being able to have that
21 conference in 2022 as compared with the problems of
22 2021?

23 A. The 2022 conference, as you said -- stated,
24 is an annual conference that we have. And the
25 frustration with the 2022 conference that -- that --

1 that we held, and I know this isn't going to sound
2 right, in the course of the last few years, because
3 of legislative changes, the number of election
4 officials, elections administrators, the turnover has
5 been astronomical. There's been almost, like, a
6 50 percent turnover, and a number of the counties
7 in -- in 2022 had new -- new people, new -- new
8 elections administrators.

9 And so, the -- most of the conference was
10 as -- like, the secretary of state would -- would be
11 making a presentation. The after part where you're
12 allowed to, you know, negotiate, you can speak -- ask
13 questions and all that, was taken up by the new --
14 new people, as -- as it should be.

15 But again, it's not going to come out
16 right, sir. I'm sorry. But they didn't have the
17 information to dig deeper and ask a deeper question.
18 So, we came away frustrated because we had a lot of
19 questions that we did not get answered.

20 Q. When you say "we," are you referring to
21 Bexar County or to the more experienced --

22 A. The big boys. The big boys. Yes, sir.

23 Q. -- election administrators?

24 A. Yes, sir.

25 Q. The latter?

1 A. The latter, please. Yeah.

2 Q. Did anything that the poll watchers did
3 in -- in Bexar County in connection with the
4 November '22 general election increase wait line --
5 wait times?

6 A. Not to my knowledge.

7 Q. Did anything that the poll watchers did in
8 Bexar County in connection with the -- the October
9 and November 2022 general elections delay any
10 openings at polling places?

11 A. Again, not to my knowledge.

12 Q. Okay. In Bexar County, were there any
13 changes in the training or selection of election
14 judges, officials or poll workers for the general
15 election in 2022 as opposed to the -- the primaries
16 and other elections in the first half of 2022?

17 A. Yes, sir.

18 Q. Could you describe what those changes were.

19 A. You're going to get me in trouble.

20 Q. I don't mean to.

21 A. Yes, sir. There was a change in leadership
22 at the Republican party of Bexar -- the local Bexar
23 County Republican party after the primary. And with
24 the new chairman and the people that he brought in,
25 for instance, you heard me speak about the partisan

1 people in the early ballot board that -- that have
2 run that, he removed everyone who had been there for
3 the prior 10 years and knew the policy and put in all
4 new people.

5 With the election officials, we have, as
6 you heard me say, you know, three people, four
7 people, five people, and the party gets to appoint
8 the election officials, and we train them and certify
9 them and assign them by writ.

10 And the chairman on the November election
11 was placing his own people in those poll sites even
12 though we had assigned people there. And so, there
13 was a lot of confusion because our appointed, legally
14 writ -- the judges were there had people calling them
15 saying -- and showing up on election morning saying,
16 I'm the judge. And it was like, who appointed you?
17 Well, you know, I have from Bexar County one,
18 Republican party, they sent me here, so.

19 And as far as, like I said, the early
20 ballot board, that was another, I don't know what
21 other word to say besides stress because we knew we
22 had a job to do. We knew it was new policies, and
23 now we had new people who didn't even experience it
24 as it had been in the past.

25 Q. Did any of that confusion or stress that

1 you just described have any effect on the experience
2 of the voters in Bexar County, so far as you know?

3 A. Hopefully, no.

4 Q. Were you able to fully staff the polling
5 places for the November 2022 general elections in
6 Bexar County?

7 A. Yes, sir.

8 Q. Okay. Are you aware of any individuals who
9 were not able to get voter -- voting assistance that
10 they wanted or needed in connection with the '22 --
11 '22 general election in Bexar County?

12 A. There is -- is a -- there is a group,
13 and -- and as you heard me say before, we work with
14 the disability community. And we have a contract
15 with a company called Deaf Link, D-E-A-F, L-I-N-K,
16 that is American Sign Language, and we have laptops
17 that we can, you know, push a button and -- and
18 someone's there.

19 And this organize -- an organizer in the
20 November election for early voting wanted us to have
21 an American Sign Language person at every poll, which
22 we -- we could not do it. That was an impossibility.
23 And so, using the federal law of accommodations, we
24 worked diligently with the deaf community and they
25 would call and make appointments.

1 And I had staff members who would be taking
2 the laptop out and meeting them at an assigned time
3 and point. Did we hit all of those? Were -- I mean,
4 I -- did -- again, I -- I don't know their structure
5 as far as how they notified everyone to --

6 Q. When you refer to "their structure" --

7 A. The deaf community.

8 Q. -- to "their structure," are you talking
9 about --

10 A. The deaf community.

11 Q. Okay.

12 A. Or again, this woman, Kay Chiodo, who is
13 the president of Deaf Link, I'm not sure how they --
14 but -- but again, you know, could I say is -- there
15 probably was someone who did not get to take
16 advantage of it. I don't know that, but my heart
17 tells me that.

18 Q. Okay. Aside from that situation, are you
19 aware of any individuals who were not able to get
20 assistance that they wanted or needed in connection
21 with the November of 2022 general election in
22 Bexar County?

23 A. Not to my knowledge.

24 Q. Did Bexar County comply fully with the
25 provisions of SB-1 with respect to voter assistance

1 in connection with the November of 2022 general
2 election?

3 A. Yes.

4 Q. I think you had some testimony in one of
5 your earlier depositions about the requirement of
6 affidavits when people arrive at the polling place
7 with seven or more people in a vehicle. Do you
8 recall that testimony?

9 A. Absolutely.

10 Q. Did that occur in connection with the
11 November 2022 general election?

12 A. Yes, it did, sir.

13 Q. What do you know about the procedures that
14 were followed in those instances?

15 A. I have two affidavits that were signed
16 and -- and -- and brought in from that election. But
17 there were numerous questions from my election
18 officials in asking about, well, you know, Jackie
19 drove the van and there were two people there, and
20 then 15 minutes later Jackie came back with another
21 two people. Does that count then as the seven? And
22 so we said, no, that it should be seven and one.

23 And so, it was -- you know, there -- it
24 just has to be finessed a little bit. We need a
25 little bit more direction.

1 MS. CUBRIEL: I'm sorry. I need to
2 interject. I just saw a text from my assistant that
3 Jackie's mic is muted. Are there --

4 THE VIDEOGRAPHER: We got -- it's unmuted
5 now.

6 MS. CUBRIEL: Okay. I'm sorry. I just saw
7 that. I was like, oh, my God. Okay.

8 THE WITNESS: Oh, God. We just did that
9 last half hour with my --

10 MS. CUBRIEL: Okay. I --

11 MR. BRYANT: The court reporter's got it.

12 MS. CUBRIEL: I know, but I know what it's
13 like to be on Zoom and to be feeling helpless.

14 MR. BRYANT: Yes.

15 MS. CUBRIEL: Okay. Are you able to see
16 when the chat messages are --

17 THE VIDEOGRAPHER: Would you like to take a
18 quick break?

19 MR. BRYANT: Okay. Let's take a quick
20 break.

21 THE VIDEOGRAPHER: The time is 11:02 a.m.
22 and we are off the record.

23 (Off-the-record discussion.)

24 THE VIDEOGRAPHER: Time is 11:03 a.m. and
25 we are on the record.

1 Q. BY MR. BRYANT: Miss Callanen, you
2 testified that there were two affidavits provided to
3 your office by folks who were required to do so
4 because they had brought seven or more people to the
5 polls in connection with the November 2022 general
6 election in Bexar County; is that right?

7 A. Correct.

8 Q. Were there any instances in which
9 affidavits should have been provided but you didn't
10 get cooperation?

11 A. Not to my knowledge.

12 Q. Okay. Did Bexar County fully comply in
13 connection with that November of 2022 general
14 election with the requirements of SB-1 on that
15 subject of affidavits?

16 A. Yes, sir. In training, uh-huh.

17 Q. Did Bexar County receive any requests for
18 accommodations by persons with disability in
19 collection -- in connection with the November of 2022
20 general election beyond what you've already testified
21 to?

22 A. Yes. Yes, sir.

23 Q. Could you describe what occurred in that
24 regard.

25 MS. CUBRIEL: Answer if you know.

1 THE WITNESS: Okay. Well, the -- the
2 visually impaired had filed a lawsuit asking for the
3 same accommodations that we have with the military.
4 We have a very robust military vote -- voting
5 population. And the federal government permits us to
6 e-mail their ballots to them. And if they're in a
7 hostile fire zone, they may e-mail them back.

8 And the visually impaired have petitioned
9 the district court to allow us to e-mail ballots to
10 them so that in the comfort of their home, they can
11 use their own screen scrapers or sip-and-puffs,
12 whatever they would need, to be able to mark their
13 ballot to have it as a fillable PDF, and then it
14 could be printed off and so they could actually be
15 voting in private without any assistance.

16 And my understanding is, due to the
17 timeliness, the judge chose three of those people out
18 of that organization for us to e-mail them their
19 ballots, and so we did this. We -- we had their
20 names and we e-mailed their ballots to them as a
21 pilot.

22 It was not a hundred percent success. The
23 screen scrapers -- my understanding, the screen
24 scrapers work with one type of PDF, but the fillable
25 PDF is -- is another. So, we went back after the

1 election, they did successfully vote. They e-mailed
2 their ballots. They printed them. They mailed them
3 back to us. And so they did, in fact, vote.

4 But the judge has, I don't want to say -- I
5 use the phrase, kicked the can down the road until
6 March to come back and reevaluate where this will go,
7 but then knowing that that will be too late for us to
8 institute it for May.

9 Q. BY MR. BRYANT: All right. Were there any
10 other instances in which the accommodations were
11 requested for persons with disabilities in connection
12 with the 2022 general election in Bexar County beyond
13 what you've already testified about?

14 A. No. I mean, we -- we have -- I think we
15 talked about it, sir, earlier about the curbside
16 voting. And we --

17 Q. Yes, ma'am.

18 A. -- we have units, like big tablets that --
19 that they vote on in their car and -- and again,
20 that's a very, very readily accessible, very, very
21 well-promoted and very, very well-attended part of
22 our voters.

23 Q. Okay. To the best of your knowledge, did
24 Bexar County comply with the provisions of SB-1
25 relating to accommodations for voters in connection

1 with the general election in 2022?

2 A. Yes, sir.

3 Q. You mentioned the military voters. Were
4 there any military voters whose votes were rejected
5 in connection with the 2022 general election by
6 Bexar County?

7 A. Yes, sir.

8 Q. Could you describe what occurred in that
9 regard.

10 A. Again, to my -- to my knowledge, and I do
11 not have a number, with the military ballots, they
12 are required to put a -- it's called a signature
13 sheet and -- and they must sign it with a wet
14 signature and -- and enclose it with their ballot.
15 So that -- again, we don't know how far that ballot's
16 coming, so there's no signature on the outside again.

17 And so, they -- they have the opportunity
18 to insert it inside. And the organization, the early
19 ballot board, when they open that ballot, if that
20 signature sheet is not in there, then they reject
21 that ballot. And so, there were some that did not
22 have the signature sheet in it. I don't know how
23 many.

24 Q. In those instances, was there an effort
25 made to cure or otherwise allow those military voters

1 to vote?

2 A. Yes. Again, that group was able to e-mail
3 them, to send in a signature sheet.

4 Q. And to what extent was that done?

5 A. I don't know.

6 Q. Okay. Do you know whether there were any
7 military voters who ultimately were unable to cast
8 their ballot in Bexar County in connection with the
9 2022 general election?

10 A. I know there were some rejected.

11 Q. Okay. And not cured?

12 A. Correct.

13 Q. Okay. There's technology, I understand,
14 that is used in connection with mail-in ballots
15 that's referred to as Votracker [sic]. Are you
16 familiar with that?

17 A. Yes, sir.

18 Q. Did the Votracker [sic] -- Votracker [sic]
19 technology work properly with respect to Bexar County
20 voters in the -- connection with the general election
21 in 2022, to the best of your knowledge?

22 A. Our local ballot tracker worked.

23 Q. Did Bexar County synch, S-Y-N-C-H --

24 A. You got it.

25 Q. -- its system with TEAM's in the last half

1 of 2022?

2 A. Yes, sir.

3 Q. When did that occur?

4 A. I can't give you a date. I mean, I know
5 that we talked about whenever the State worked its
6 deal with DPS so that we were able to get the TDLs
7 for our voters, that that synch occurred.

8 We, as an offline -- as an offline county,
9 we're required once a month to do a synch with TEAM.
10 And, in fact, ours was done this morning. I don't
11 know the results of it because, obviously, I'm over
12 here.

13 Q. Okay.

14 A. But we started it at 7:00 this morning.
15 So, each of the offline counties, and we do that as
16 part of our normal maintenance.

17 Q. Did that occur prior to the general
18 election during the summer or early fall of --

19 A. Yes, sir.

20 Q. -- 2022?

21 A. I'm -- I'm sure that's when it was, but
22 I -- I can't pinpoint it, a time.

23 Q. In connection with that process of synching
24 the Bexar County system with the TEAM system, did you
25 become aware of any problems with that process?

1 A. No, other than it was a dance of joy that
2 we were able to get some TDLs matched up with our
3 voters.

4 Q. Do you have any description of the extent
5 of the benefit that you -- that Bexar County received
6 as a result of completing that process during the
7 summer or early fall of 2022?

8 A. I -- I'm sure we received -- we reaped a
9 benefit. I'm sure we -- we did.

10 Q. Okay. Can you quantify it at all?

11 A. No. I wish I could.

12 Q. Okay. We talked about the 45-day deadline
13 for military voters in connection with the
14 November -- or general election in 2022, and you
15 testified that -- that Bexar County met that
16 deadline. When, in general, did other mail-in
17 ballots go out to potential mail-in voters?

18 A. Well, again, the MOVE Act is that 45 days.
19 And so, I think it was maybe September 22nd.
20 Don't -- don't hold me to it. I think that's about
21 the date of it. And then we start mailing our
22 civilians the beginning of the month, the next --
23 October 1st.

24 Q. Okay. And was that process with respect to
25 civilians done in a timely manner by Bexar County in

1 connection with the 2022 general election?

2 A. Yes, sir.

3 Q. Okay. We looked briefly at the notice of
4 deposition and the topics for examination. I believe
5 you have that --

6 A. Uh-huh. That's right.

7 Q. -- Exhibit Number 1 in front of you.

8 A. And I have a copy here.

9 Q. Very good. First topic is your
10 interpretation, application, operation and
11 implementation of the challenge provisions of SB-1
12 during the November 2022 general election in
13 Bexar County. That's a mouthful. I want to break it
14 down just a little bit.

15 Do you recall any issues that arose with
16 respect to interpretation of SB-1 in connection with
17 the general election in 2022?

18 A. No, sir. We -- we still process and we
19 still see challenge registrations daily, I mean, in
20 our dashboard when we look at it.

21 Q. Okay. Let's look at Number 2. Did you
22 receive any guidance, advisories, instructions,
23 handbooks or trainings from the secretary of state's
24 office regarding the challenge provisions of SB-1 in
25 connection with the November general election?

1 A. Again, I -- yes, advisories.

2 Q. Okay. Anything besides advisories?

3 A. No.

4 Q. Okay. I have some of those advisories

5 here, and we can look at them briefly. But in

6 general, how did you and your team use the

7 advisories? Or what, if any -- I'll stop at that.

8 How did you use those advisories that you received in

9 2022 in connection with the general election that

10 year?

11 A. We used them in training.

12 Q. Okay.

13 A. So, they were passed on to the election

14 officials.

15 Q. Was that true of all of the advisories?

16 A. No, just the ones that -- that affected the
17 poll site.

18 Q. Okay. There's a reference in Number 5 to
19 military and overseas voting. What does the overseas
20 voting refer to as opposed to the military voting?

21 A. That's the MOVE Act, Military Overseas
22 Voting Empowerment Act, that -- that's the 45-day.

23 Q. Okay.

24 A. That -- that's the one. It takes longer to
25 get a ballot overseas than it does to get it to

1 Fort Hood.

2 Q. Yes. And did you in Bexar County comply
3 fully with the MOVE Act during the November 2022
4 general election, to the best of your knowledge?

5 A. Absolutely.

6 Q. Were any overseas voters unable to get
7 their mail-in ballots counted as opposed to military
8 voters in connection with the November 2022 general
9 election?

10 A. Not to my knowledge.

11 (Exhibit 2 was marked.)

12 Q. BY MR. BRYANT: All right. Let's look at
13 Number 8A. And I'm going to show you what's been
14 marked as JCF -- JC3, Exhibit 2, which is a one
15 page --

16 A. Oh, okay.

17 Q. -- document.

18 A. Uh-huh. Reconciliation form.

19 Q. Okay. Can you explain what Exhibit 2 is.

20 A. This is a new form developed out of SB-1
21 that's called the Election Reconciliation Form. And
22 this is done by the presiding judge of the central
23 counting station.

24 Now, the central counting station is the
25 room, the function that counts the mail ballots in

1 scanners. It's the area that harvests all of the
2 votes from the poll sites from early voting on
3 election day.

4 And so, it's the area that, basically,
5 people think of as tallying the vote.

6 Q. And is this particular Exhibit 2 the
7 election reconciliation document that was prepared in
8 connection with the 2022 general election for
9 Bexar County?

10 A. Yes, sir.

11 Q. See that although the election date is
12 listed as November 8, 2022, the attestation, which is
13 about three-quarters of the way down the page on
14 Exhibit 2 is dated November 22nd, 2022. What is your
15 understanding as to what occurs between the election
16 day and the date on which the election reconciliation
17 form is signed?

18 A. Again, I think I did previously, probably
19 hours ago, when I said that the election's not over
20 at 7:00 on election day. Again, the legislature gave
21 us a much-needed permission to count, accept mail
22 ballots that arrived to us the next day after the
23 election. And we normally receive hundreds of those.

24 And in the past, it was sort of heart
25 breaking because all of those people were

1 disenfranchised. So now we can open them and count
2 them. We have our military, as we just spoke about,
3 the overseas military, they have six days after the
4 election to have their ballot reach us.

5 We have provisional ballots, which we
6 haven't talked about yet, and the provisional ID
7 ballots, for the provisional ID, they have six days
8 after the election to come to our office to cure
9 those. We use that word "cure" a lot.

10 And so, the early ballot board that I've
11 spoken about, they do not re- -- regroup until all
12 those deadlines have passed. And so, then you can
13 see they'll come in and then they do their work:
14 accepting, opening, hand them over to the central
15 counting station.

16 And all of this is going on, which, again,
17 takes all that time. And so, you get your final,
18 final, after all functions are in, where we've cast
19 and hand -- and we've counted every single possible
20 ballot that can be counted in that election.

21 Q. And for the 2022 general election, was that
22 all completed on or before November 22nd, 2022?

23 A. Absolutely.

24 Q. Okay. Let's -- let's talk just a little
25 bit about these provisional ballots. Could you

1 explain that process for somebody who is not as
2 familiar with it as you are.

3 A. Or you. A provisional ballot --

4 Q. That's the same thing.

5 A. Again, dare I say, and as we tell our
6 judges and we tell our people in training, the golden
7 rule in elections, in election administration, is
8 every person who wants to vote votes, period. And we
9 see that. And again, previously, I had spoken about
10 the college students who weren't registered here.

11 Provisional ballots are set up in such a
12 way for the person who comes to the polls, they step
13 to the qualifying table and they're not on the voter
14 list for whatever reason, and they swear they -- they
15 registered at DPS. And so, they are adamant they
16 voted -- they registered, and so they're going to
17 vote.

18 And our system is set up that the election
19 officials reach out to us and we take the address of
20 that person so that we can tell them what ballot
21 style, what precinct to vote that person in. And the
22 person goes over and puts their card in and votes.

23 But instead of it going into the machine
24 that tallies, they bring it back to the election
25 official and it goes -- and just like a mail ballot,

1 it goes in an envelope, it goes in a green envelope
2 that the voter signs, puts their information on. The
3 judge signs it and says, we're -- we're casting this
4 because they said they registered with DPS.

5 Well -- or they moved here and they thought
6 they were registered to vote. Or what we see an
7 awful lot of, and I'm hesitant to say it, but -- but
8 it's just the way of our world is, in large counties,
9 we have a lot of suburban cities or suburban school
10 districts that are in multiple counties. And you
11 would be amazed at the people who don't realize what
12 county they're in.

13 And so they'll come to the poll, come in,
14 but they are registered in Guadalupe. Well, they
15 don't want to drive back to Guadalupe. They're in
16 Bexar County now because we have vote centers so they
17 can vote anywhere, and they're not registered here
18 but they swear they're any -- so, they get to cast a
19 provisional ballot.

20 There's any sundry reasons. I have no ID
21 on me. I have no -- nothing. I have no photo ID.
22 They get to cast a provisional ballot. And then the
23 ID provisional ballot people have six days to come
24 downtown to our office and cure it, show us their ID.

25 And we have that six-day period when we get

1 the ballots in to check with DPS. They have a portal
2 for us where we can enter the name, David, you know,
3 and the form asks, approximately when did you go to
4 DPS. And then DPS will send us a card that -- an
5 image of the card, their signature.

6 And so many times the box says, no, the X
7 is in the box that says, no, for voter registration.
8 So, of course, we can't count that provisional
9 ballot. But the staff works diligently in those six
10 days.

11 Sometimes we get -- on a small election,
12 we'll have a hundred provisionals. As you can see on
13 this one, you know, we had quite a few to go through.

14 Q. Did you have 474 in Bexar County in
15 connection with the November 2022 general election?

16 A. Absolutely. Yes, sir.

17 Q. And how many of those ultimately were
18 counted after they were cured or verified as -- as
19 proper --

20 A. 100 --

21 Q. -- eligible votes?

22 A. 129.

23 Q. Okay. How are the voters who cast a -- a
24 provisional ballot informed of the need to go take
25 steps to make the ballot eligible for counting within

1 the following six days?

2 A. For the ID voters, they are handed a -- a
3 form that actually has a map to our office on it with
4 the dates and times and, you know, what they need to
5 bring.

6 Q. Okay. Okay. On Exhibit 2, there's an
7 indication in column two entitled, "Rejected
8 ballots," that there were 274 mail ballots rejected
9 out of 39,655 mail ballot voters in Bexar County. Am
10 I reading that correctly?

11 A. Yes, but.

12 Q. Could you explain the "but."

13 A. Well, again, if -- if you just look at the
14 math, it doesn't make any sense. It says, well, you
15 had 39,655 mail ballots sent out and you only
16 rejected 274. And then you're saying, well, then
17 that means you counted 32,000. Well, 274 from that
18 number is a far cry from how many were counted.

19 And so in that number, the difference, and
20 I think we've -- we've talked about it, but you have,
21 let's say 396, just round it off, we sent all those
22 out.

23 Q. Yes.

24 A. Okay. And we actually counted 326.
25 Let's -- so, just --

1 Q. Okay.

2 A. So those other ballots, where are they?
3 You only rejected 274. Where's the rest of them?
4 Where did they go? Well --

5 Q. Are those down at the lower left-hand of
6 the form under S?

7 A. Yes, sir. And -- and what that means is,
8 they turned their ballot back in. Because they -- we
9 talked about it earlier, they just want that ballot
10 as a sample ballot and then they want to go vote in
11 person and so they cancel that ballot. We have
12 people that -- that -- that do that. I mean, you
13 know, thousands of people that -- that do that, and
14 any sundry reason like that.

15 We -- we have the ones, we talked about,
16 who get -- get rejected for the SSN, TDL. They get
17 sent -- send it back, they get the phone call. They
18 never come in to cure it. They're just like, I'm not
19 going to do it. And so, all of those added up were
20 7,000 ballots.

21 Q. Is -- does Bexar County know how many of
22 those 7,091 mail ballots not returned by a voter that
23 are listed on Exhibit 2 are people who ultimately
24 voted either early or in person or on election day?

25 A. We -- we know that 3,060 of that group

1 actually voted in early or in person because they had
2 to relinquish their ballot. They had to come and
3 turn it in and cancel it. And so, we have a complete
4 record of that. We have their signature on a piece
5 of paper that says, I'm canceling this mail ballot to
6 vote in person.

7 Q. If a voter requested a mail ballot and then
8 simply shows up at the poles on election day wanting
9 to vote, what occurs in Bexar County?

10 A. The only avenue they have open to them is
11 the provisional ballot. So, they will vote the
12 provisional ballot. The voter will state, I never
13 received my mail ballot. The judge will say, didn't
14 present their mail ballot.

15 So, we get the provisional ballot done.
16 And as I said, the staff has to do each one of these
17 individually. And they'll be able to take that
18 provisional ballot of the person who says, I never
19 received it, and they can go back to the mail room,
20 they can go back to the early ballot board and say,
21 is David's ballot here? Is his signature here? And
22 it's like, oh, well, he's already voted.

23 So, the provisional ballot doesn't get
24 counted. Or, no, we don't have any record of David's
25 ballot being here, so let's open it and count it so

1 that David can... so, every one of them, that kind of
2 investigation is done.

3 Q. Let's go off the record for just a second,
4 and then I will see if I have a few more questions
5 for you, and then I will -- we can either break for
6 lunch or -- or other attorneys can ask you questions
7 and I'll reserve some time for after the other
8 attorneys have asked their questions of you, if
9 that's okay.

10 THE VIDEOGRAPHER: The time is 11:33 a.m.
11 and we are off the record.

12 (A brief recess was taken.)

13 THE VIDEOGRAPHER: The time is 11:43 a.m.
14 and we are on the record.

15 Q. BY MR. BRYANT: Okay. Miss Callanen, we
16 discussed you testified about the -- you testified
17 about the requirement for military voters that they
18 enclose a signature; is that correct?

19 A. A signature page. Yes, sir.

20 Q. Yes. And is that a requirement that was
21 put in only in SB-1 or did that pre-exist SB-1?

22 A. No, sir, it pre-existed.

23 Q. Okay. So, to the extent that that caused
24 any military votes, mail-in votes to be rejected,
25 that would have occurred prior to SB-1?

1 A. Yes, sir.

2 MS. CUBRIEL: Objection; form.

3 Q. BY MR. BRYANT: Okay. Now, we talked about
4 the 1.7 percent rejection rate that you experienced
5 in Bexar County in the 2022 general election. How
6 did that compare specifically with the rejection rate
7 that Bexar County experienced in the 2018 general
8 election?

9 A. I don't have that number. I don't -- I
10 don't have that number. I know it would have been
11 slightly higher.

12 MS. CUBRIEL: And we also object that I
13 believe that's beyond the scope of the amended
14 scheduling order.

15 Q. BY MR. BRYANT: Okay. Are you saying it's
16 slightly higher in 2018?

17 A. Yes.

18 Q. I'm trying to remember the phrase that you
19 used when you described 2022 as compared to 2018. It
20 was something like, a like election?

21 A. Yes.

22 Q. Was that the phrase? I think it was a
23 little --

24 A. Yes, sir. I mean --

25 Q. -- more -- less awkward than that.

1 A. No. When -- when we're preparing for
2 election, we always look back and use as a model the
3 last like election.

4 Q. Okay. And do you use that term because the
5 presidential election years are in some way
6 significantly different from the years like the
7 general election in 2022?

8 A. The turnout is much higher. Yes, sir.

9 Q. Okay. Is it also true that the
10 November 2022 election may involve a different
11 statewide offices that are on the ballot?

12 A. Yes.

13 Q. And was that the case for November 2022 as
14 compared with either of the general elections in 2020
15 or 2018, or both?

16 A. Yes.

17 Q. Was there any U.S. Senate election on the
18 ballot in the general election in 2022?

19 A. No, sir.

20 Q. Was there a U.S. Senate election on the
21 ballot in 2018?

22 A. Yes, sir.

23 Q. And in your experience, does that typically
24 affect voter turnout?

25 A. Yes, sir.

1 Q. Was voter turnout in the general election
2 in 2022 also affected as compared with 2020 by the --
3 the change in the circumstances with respect to
4 COVID?

5 MS. CUBRIEL: Objection; form.

6 THE WITNESS: No, not in the whole turnout,
7 but in the methodology of it, it -- COVID affected
8 it. I -- I firmly believe that that's why we saw so
9 many mail ballots, the 124,000 and our in-person
10 numbers were down, but we still had a high --
11 presidential years are always a higher ye- -- higher
12 turnout.

13 Q. BY MR. BRYANT: Okay. I'm -- I'm not sure
14 the question you answered was the one I had in my
15 mind, so let me ask to try to clarify it. Do you
16 believe that one of the reasons that you had a lower
17 turnout in 2022 was that COVID was not an issue?

18 MS. CUBRIEL: Objection; form.

19 Q. BY MR. BRYANT: Or that perhaps the
20 existence of COVID affected voter's behavior and
21 propensity to vote in 2020?

22 MS. CUBRIEL: Objection; form.

23 THE WITNESS: No.

24 Q. BY MR. BRYANT: Did I understand your
25 testimony to be that you believe that the number of

1 mail-in ballots spiked up in 2020 because of COVID?

2 A. Yes, sir.

3 Q. Do you expect a similar spike in the next
4 presidential election in 2024?

5 MS. CUBRIEL: Objection; form.

6 THE WITNESS: Not that high. But, I mean,
7 it'll obviously be higher than 40 that we have now.

8 Q. BY MR. BRYANT: In the connection with the
9 2020 general election, was accommodation requested by
10 any voter of Bexar County as to any of the
11 requirements of SB-1?

12 A. I'm not sure I understand.

13 Q. Such as voter assistance or only with
14 respect to what you already testified to, which was
15 visual impairment, hearing impairment?

16 MS. PAIKOWSKY: Objection to the extent
17 that this is asking a question about outside the
18 scope of the 2022 election.

19 Q. BY MR. BRYANT: Yeah. And I want to make
20 it clear I'm asking about the 2022 general election.
21 Was there -- were there any other requests for
22 accommodations as to disabilities that were because
23 of any requirements that SB-1 imposed for the first
24 time?

25 MS. CUBRIEL: Objection; form.

1 THE WITNESS: Not to my knowledge.

2 Q. BY MR. BRYANT: Okay.

3 MR. BRYANT: I'll pass the witness at this
4 time and reserve my remaining time until after other
5 counsel have had an opportunity to ask their
6 questions. And I would also ask if anyone plans to
7 take a lunch break and if so, when you would like to
8 do so.

9 MS. CUBRIEL: We could go off the record to
10 discuss lunch break.

11 MR. BRYANT: Okay. Let's go off the
12 record.

13 THE VIDEOGRAPHER: Time is 11:50 a.m. and
14 we are off the record.

15 (At 11:50 a.m., a luncheon recess
16 was taken, the deposition to be
17 resumed at 12:20 p.m.)

18
19 AFTERNOON SESSION

20 (At 12:23 p.m., the deposition was resumed,
21 the same persons being present.)

22 THE VIDEOGRAPHER: The time is 12:23 p.m.
23 and we are on the record.

24

25

EXAMINATION

BY MS. PAIKOWSKY:

Q. Good afternoon, Miss Callanen.

A. Good afternoon.

Q. Did I get it right?

A. Yes, you did. I'm proud of you.

Q. Perfect. My name is Dana Paikowsky and I am an attorney for the United States, as you know. So, I know we've talked a lot about some of the voter education efforts you did in the November 2022 election. And I don't want to go over anything we've already talked about.

But was there any specific proactive voter education around SB-1's identification number provisions that your office did in the 2022 general election that we did not already talk about?

A. No.

Q. When your office was doing these voter education efforts, did you seek feedback or approval from the secretary of state's office?

A. No.

Q. And -- okay. So, going back to the insert. Has your office communicated with the secretary of state's office about the insert?

A. I think we -- we -- we talked once and I --

1 I think Christina asked me for it. And then I -- and
2 then that was, like, the end of the -- the dialogue.
3 I scanned it and e-mailed it up to her.

4 But then I heard, then Secretary Scott was
5 doing an interview, and he talked about the insert
6 Bexar County did and the success of it. So, I know
7 there had been some interaction at that point but not
8 with us.

9 Q. Did you consult with the secretary of
10 state's office during the revisions that you made to
11 the insert?

12 A. No.

13 Q. You mentioned the secretary of state's
14 office had their own version of a ballot insert that
15 they had offered to counties. Did they offer that
16 insert again in the 2022 general election?

17 A. I'm not sure, but I would think so.

18 Q. Would you ever consider using that insert
19 in Bexar County?

20 A. No.

21 Q. Why not?

22 A. It was -- please, I don't want to offend
23 the three of you, but it was too legalese. It -- it
24 wasn't in plain language. And we just see the
25 disconnect there because we fill the voters up with

1 so much legalese. As you heard me say before, we
2 have to put those papers in and this is the law and
3 you have to do that, and we want to reach our voters
4 on a different level.

5 Q. Earlier we discussed a court case that your
6 office, one, related to the language that is on
7 election materials about the ID provision from Senate
8 Bill 1. Can you explain more about that court case.

9 THE WITNESS: Lisa, that will be you.

10 MS. CUBRIEL: (Shakes head in a
11 side-to-side motion.)

12 THE WITNESS: No? I don't know what Senate
13 Bill 1 --

14 MS. CUBRIEL: I'm not sure what you're
15 talking about.

16 THE WITNESS: I don't know either. I don't
17 know which one you want. I mean -- I'm -- I'm sorry.
18 The stack on my desk of lawsuits, I'm not sure which
19 one we're talking about.

20 Q. BY MS. PAIKOWSKY: I'm happy to clarify.

21 A. Please, Dana. Please.

22 Q. So earlier, it is my understanding that
23 SB-1's ballot identification provisions require
24 certain language beyond applications for ballots by
25 mail --

1 A. Yes.

2 Q. -- or BBMs and carrier envelopes that asks
3 voters to put either a Texas driver's license or
4 other ID or an SSN --

5 A. Correct.

6 Q. -- for. It is my understanding that your
7 office was engaged in litigation about that language;
8 is that correct?

9 A. That -- I -- I -- I think what you're
10 referring to is, we were a party to it but it was the
11 secretary of state's office. Because -- and I
12 don't -- I think they lost that one because that's
13 when the language on the back of the carrier
14 envelopes had to change.

15 And that's what, again, made us all crazy
16 because we had just done that. We had just gone
17 through an election, you know, telling the people
18 this is what we need, and then the State said, well,
19 now you have to redact this -- there were, like, two
20 sentences on -- on the back of whatever -- and I'm
21 sorry, I don't know the specifics on that lawsuit.

22 But I know that we got the directive from
23 the State saying, here's your envelope and you can
24 redact, you can take a Sharpie and black it out. And
25 at that point, we didn't know if we were going to

1 have 40 or if we were going to have a hundred.

2 So, we went back to our vendor and we -- we
3 asked Aaron, is there any way -- let me rephrase
4 that. We know there was a way and we were willing to
5 ask him would he, please, take all the stock we had
6 back, and for him to overlay a spray on it so that it
7 would be nice and neat and let him redact them from
8 us.

9 And so he said, yes. And so, we -- we sent
10 him back all of our stock. It was, like, 30,000 or
11 something that we had and he reprinted them. I -- I
12 can't tell the specifics, but he overlaid. So when
13 we got them back, the part of that lawsuit that said
14 they had to remove that language was miraculously
15 taken out and we paid three cents more a ballot -- I
16 mean, an envelope to have it done.

17 Q. What specific language was redacted from
18 the ballot envelope?

19 A. I'm sorry. I don't -- I -- I vaguely
20 remember that it had something to do with the
21 assistance part of it, if that's -- is that what it
22 is? You know the answer; right?

23 Q. I cannot answer questions here, but I
24 appreciate the answer. To your knowledge --
25 actually, withdrawn.

1 In the 2022 November general election, did
2 the ABBM forms that Bexar County used include the
3 and/or language with respect to IDs, the -- the SB-1
4 ID provision?

5 A. From the State, the new ones that we had to
6 get --

7 Q. Uh-huh.

8 A. -- yes.

9 Q. In the 2022 November general election, did
10 you -- do you believe voters were confused by that
11 language?

12 A. Oh, absolutely.

13 Q. In the November 2022 general election, did
14 Bexar County's carrier envelopes include the and/or
15 language from SB-1's mail ballot ID provision as
16 well?

17 A. Yes. It was from the secretary of state.
18 We used exactly what they sent us.

19 Q. In the November 2022 general election, were
20 voters confused by that and/or language?

21 A. I'm sure they were.

22 MR. BRYANT: Objection to form.

23 MR. GENECHIN: Calls for speculation.

24 Q. BY MS. PAIKOWSKY: So, I'm going to
25 backtrack a little bit. Again, to voter education

1 efforts, which I want to specify include things like
2 creating the ballot insert and -- and everything
3 you've discussed previously. How much money did
4 Bexar County spend on voter education efforts you
5 described?

6 A. Out of the election -- my budget. The
7 general fund budget. We spent -- I spent \$40,000
8 which was, you know, minimal. But that was all
9 towards the voter education part. I spoke previously
10 about two commissioners on the -- on the court that
11 got involved and they set a budget of 200,000 that
12 they spent.

13 Q. How do those numbers, the 40,000 and
14 200,000, compare to like elections?

15 A. Again, prior to that, the court was not
16 involved. And when it's a like election, thank you,
17 we have and I do have a media person that comes on
18 that manages social media, setting up the -- the
19 media, you know, press conferences and all of that.
20 So, that has stayed the same for, like, the last
21 10 years.

22 Q. As compared to the November 2022 general
23 election and the amount of money the county expended
24 on voter education, was it more or less than in -- or
25 the same as in other like elections?

1 A. Well, again, this -- this one cost more
2 because we had to pay for the insert, you know,
3 numerous times. So, we had them, you know, put away
4 the first version, put away the second version. And,
5 you know, I mean at that, we're -- we're just talking
6 a couple thousand dollars to have -- to have sheets
7 printed and -- and cut.

8 And then, again, other than, as I said,
9 when we sent all of our remaining stock back to our
10 printer to have those redacted, you know, we had a
11 bill from them.

12 Q. Were there any other resources that your
13 office devoted to voter education efforts related to
14 the ID provision, the ballot ID provision, in the
15 2022 general election?

16 A. No.

17 Q. In the November 2022 general election, did
18 your office expend any resources to educate your
19 employees about implementing the ID provision of
20 Senate Bill 1?

21 A. Okay. I mean, we had in-house training. I
22 don't know if that counts as expending, but we had
23 numerous in-house trainings. We have -- when we deal
24 with our election officials for their training and
25 for their -- when we trained all of our judges and

1 all of our workers, the early voting -- our early
2 voting crews, not necessarily did we train them for
3 early bal- -- for the ballot -- mail ballot.

4 But we had to bring them up and give them
5 the knowledge of it because voters were going to be
6 coming in. So, you know, did -- it was minimal what
7 we expended, but we made sure that they all had
8 copies of the insert, that they had copies of this
9 carrier envelope if they saw exactly what was needed
10 so that if somebody came in and asked, or was
11 starting to carry on a conversation with them, that
12 they wouldn't feel like, what are they talking about.

13 And so, every time we had a training
14 session we entered into that. But again, I don't
15 know how to quantify that.

16 Q. From your experience in the November 2022
17 general election, do you anticipate continuing with
18 the same efforts you've already described?

19 A. Yes.

20 Q. I'm going to switch gears a little bit and
21 ask you about mail ballot processing and absentee
22 ballot -- ABBM processing. So, for the November 2022
23 general election, did your office hire employees or
24 contractors in order to facilitate, support or assist
25 with mail voting and the implementation of

1 Senate Bill 1's identification requirements?

2 A. Absolutely. But let me, please, speak to
3 that. I think when David asked me earlier on in the
4 day, I mean, my staff is 20 in number. And so, we
5 have a fantastic mail -- we call them the mail room
6 people who are full-time temps that -- now -- I don't
7 want -- permanent temps, because they'll come and
8 work with us through an election and then they go
9 away and they'll come back and work.

10 And so, we have two strong leads, one from
11 each party. They are full-time temps and they manage
12 that, and then we bring in temps for them. Again, we
13 bring in temps to answer phones. I mean, we bring in
14 temps to handle that work flow.

15 As you heard me say before, every piece of
16 paper that comes in our office is scanned, and it's
17 scanned into that database. And so, yes, we -- we do
18 bring in -- we bring in tons of temps. We couldn't
19 do it without our faithful temps.

20 Q. Was the staffing needs of the November 2022
21 general election -- actually, withdrawn.

22 You mentioned that your office hires
23 temporary staff around election time.

24 A. Yes, ma'am.

25 Q. Were your staffing needs greater for the

1 November 2022 general election with respect to
2 staffing or processing mail ballots and implementing
3 Senate Bill 1 than they had been in like elections
4 for mail voting needs?

5 A. Yes.

6 Q. Why was that?

7 A. Again, because of the additional -- that
8 perforated flap that -- that I was speaking of. In
9 March, in the -- in the primaries, we didn't have the
10 ability or didn't understand that SB-1 allowed us to
11 take that flap down.

12 And so, when we turned over the early
13 ballot board and, you know, took -- but as we got
14 into this, we understood that we could facilitate
15 things by taking just one of -- we were allowed to
16 take, like, the top perf down so that it fell down
17 but it wasn't completely removed and very
18 time-consuming because that had to be a one-by-one
19 person with a letter opener. I mean -- and so, yes,
20 we did have additional temps brought on board in
21 November of 2022.

22 Q. Do you bring in temp -- temporary staff or
23 additional hiring to assist with the processing of
24 ABBMs as well?

25 A. Yes.

1 Q. Were the staffing needs for the
2 November 2022 general election, with respect to
3 hiring temporary staff or additional workers, greater
4 than like elections, with respect to processing
5 ABBMs?

6 A. We probably added one -- one or two more.
7 Because with SB-1, the -- the usual -- or the
8 routine, I guess is the word I'm looking for, prior
9 to SB-1, you know, they would scan it, they would
10 look at it. Was -- you know, was it all correctly
11 filled out. Did it have a precinct number. Was it
12 signed. And then it would be like, okay, accept it
13 and it would go into the cyber space so that we,
14 then, would be able to print a ballot for it.

15 But with SB-1, that process took longer.
16 Because now, not only would they scan it in put it
17 in, yes, do you have -- this is the name. This is
18 the signature. That's the address we have. This is
19 the precinct.

20 Now they had to stop and look at the TDL or
21 the SSN and bring up the voter registration card that
22 we had scanned to make sure that we had that number
23 there. And so, not only -- how do I say this because
24 I'm -- I'm not technical. Please understand me.

25 But in the past when we had these people

1 doing this, they had one computer and one screen.
2 But to facilitate the voter registration, we now gave
3 them a second screen so that they could -- does that
4 make sense? Do you understand? Okay. That's -- and
5 so, yes, it took longer. And so, yes, we had to get
6 more temps.

7 Q. For the additional staffing that your
8 office had to hire during the 2022 general election
9 to assist with mail ballot and ABBM processing,
10 approximately how much did that cost?

11 A. I actually barely know that number. It
12 costs us about \$218,000.

13 Q. Is \$218,000 an unusual -- unusually high
14 expense for temporary staff and additional workers as
15 compared to like elections?

16 A. For this one, yes, it was. It got my
17 attention.

18 Q. Given your experience in the November 2022
19 general election, do you anticipate your needs to
20 hire temporary staff and additional employees to
21 process mail ballots will remain higher in the future
22 than it has been in the past?

23 A. Yes.

24 Q. Where does the money come from -- or excuse
25 me. Withdrawn.

1 In the November 2022 general election,
2 where did your office get the money to hire these
3 additional employees?

4 A. From the general fund. From Bexar County's
5 general fund, my office budget.

6 Q. What impact, if any, did the county's
7 funding of these additional staff members have on the
8 budgets of your other programs?

9 A. In the long run, I would say it had
10 none because the county judge was very specific in
11 addressing the fact that we -- we were to be granted
12 whatever we needed for getting this done because he
13 was very, very understanding.

14 Q. What impact, if any, did the county's
15 funding of your additional program have on other
16 programs or county initiatives?

17 A. Again, I wouldn't know that.

18 Q. Do you believe that there is anything
19 further your office could do beyond what it did in
20 November 2022 to bring down rejection rates further?
21 Excuse me. Withdrawn.

22 Do you believe that there's anything your
23 office could do beyond what it did in November -- in
24 the November 2022 general election to bring down
25 rejection rates further because people were unable to

1 comply with the ID provisions in Senate Bill 1?

2 A. I foresee us doing exactly what we've been
3 doing, from the inserts, to the media, to whatever.

4 Q. Is there anything additional you believe
5 you could do?

6 A. That's a tough -- that's a tough question.
7 I -- I hope and I pray that some of my smarter
8 counterparts have developed things like this, and
9 that when we get together we share and that we can
10 assist from different -- I'm hoping someone has
11 looked at it from a different angle and helps do
12 that.

13 But again, like, we had our 40,000 people
14 vote by mail or applications, and when we look back,
15 that's basically the same pool that we had vote in
16 2018. And so, then they are already educated and
17 they -- they understand this.

18 And I think, again, for this May election,
19 our upcoming election and for November, we'll have a
20 much smaller turnout. And so, it will be our heart
21 and true, it's going to be the core of our -- our
22 voters. And I think through this year they -- they
23 get it. They get it, because they lived through
24 March of last year and -- and November. And so, I
25 see us doing the exact same thing this year.

1 And as I said, just to meet with
2 counterparts, there's got to be smarter and better
3 ideas out there as we ramp up to '24, because that's
4 where we'll see people who have not done this before,
5 and we'll have to go back into a major push.

6 Q. From your experiences implementing SB-1's
7 Senate -- ID provision in the November 2022 election,
8 do you believe you will ever be able to get the
9 rejection rate to zero?

10 A. No.

11 Q. Why not?

12 A. Human nature. Human nature. There --
13 there's somebody that just is sure that they've done
14 everything and filled it out correctly and haven't
15 signed it. I mean, we -- we get -- we get ballots
16 where on the outside it's -- it's -- it's perfect.
17 The numbers are there. The signatures are there, but
18 then when they open it -- when it goes to the early
19 ballot board and they open it, there's no ballot in
20 it. They forgot to put the ballot in. I mean, I --
21 I'm sorry, that's our -- that's the reality we live
22 in.

23 Q. To your knowledge, in the November 2022
24 general election, were any eligible voters prevented
25 from voting because of Senate Bill 1's ID provisions?

1 A. I would say, no, with a little bit of a
2 reservation. One of the difficulties that we had
3 with the curing process was, we -- we -- they'd send
4 it back, they'd notify them and they could, then,
5 hand-deliver their ballot back to our office; okay?

6 And so, they would bring the ballot back to
7 us. And they can bring that ballot back on election
8 day. So, in the morning -- and, again, I don't want
9 to ramble, but in -- in the morning the first couple
10 ones that came in, we would have a husband come in
11 and he would have the two ballots. He would have his
12 and his wife's. Well, we could only accept his. We
13 could not accept his wife's because they had to
14 hand -- hand-deliver it, show their photo ID, sign it
15 in.

16 And the gentlemen -- the first couple, they
17 were angry, as -- as they should be, as they should
18 have been. And so, those few in the morning, that --
19 that wife, spouse, her ballot was not turned in. And
20 you know, we explained, go ahead and vote in person.
21 Okay.

22 So, did they? I don't know. But I know
23 by, like, 10:00 that morning it was becoming obvious
24 that this was a problem. And so, we're really
25 blessed because right across the street from --

1 across the freeway from us is our post office.

2 So, I mean, I literally got money out of my
3 wallet and had a staff member run over there and buy
4 books of stamps so that if this happened again and
5 again, which it did, we were giving them -- you know,
6 probably shouldn't tell people this, but we were
7 giving them a stamp to put on that ballot and take it
8 directly across the street and mail it and make sure
9 it was time stamped.

10 Because, again, our legislation has said if
11 the ballot is date stamped by 7 o'clock on election
12 day it can be delivered the next day. And so, that
13 was, like, an on-the-fly, we did it. We -- we
14 managed to do that. But I can't account for those
15 first hours. So, I hope that makes sense to you.

16 Q. Is it possible that in the 2022 general
17 election some eligible voters were prevented from
18 voting because they were not able to cure ballot
19 defects that arose under Senate Bill 1's ID
20 provisions?

21 A. I'm sure. Excuse me.

22 Q. Okay. So, I'm going to ask you a couple of
23 process questions. And I think the point of these
24 questions is to ascertain if anything has changed
25 since the last time you were deposed.

1 So, since the November 2022 election, has
2 anything changed about the way your office processes
3 incoming ABBMs with respect to the voter ID
4 provision?

5 A. No.

6 Q. Similarly, has anything changed in your
7 office with respect to the process by which you
8 receive and intake a ballot to determine compliance
9 with SB-1's mail identification provision in the
10 November 2022 election?

11 A. Well, we haven't had an election since
12 November 2022, so we haven't brought any in, but we
13 brought the ABBMs in, and we're doing the -- you
14 know, the same thing, the same processing, the two
15 screens, making sure we have the numbers. But I'm
16 sorry, I can't go to the ballots.

17 Q. No. I -- I got turned around. So, since
18 the March primaries, has anything changed about the
19 way your office receives and processes ballots to
20 determine compliance with SB-1's mail identification
21 provisions?

22 A. Sure. I mean, very proudly say, you know,
23 we've actually gotten into the rhythm. We -- we've
24 gotten so that, as far as the temps and training,
25 it's gone a lot smoother. So, I mean, we -- we

1 had -- we jokingly said we had the 18 by November,
2 because they knew how to look for it and what to look
3 for. And so, from that standpoint, it -- it did
4 cycle down.

5 Q. In your previous testimony, you mentioned
6 when a ballot, or ABBM comes in, a staffer who
7 receives it would often type in the first name or a
8 date of birth in order to pull up the record and
9 identify the voter. Is that still your process?

10 A. Yes, ma'am.

11 Q. Earlier you testified that your office does
12 not make phone calls or send e-mails to cure ballot
13 defects for ID -- ID ballot defects.

14 A. Correct.

15 Q. Does your office use phone calls or e-mails
16 to notify people of issues with their ABBMs failure
17 to comply with SP-1's identification provision?

18 A. Yes, ma'am. Yes, ma'am. If -- if they've
19 given us that information.

20 Q. How long has your office -- excuse me. Has
21 your -- withdrawn.

22 Has your office changed its process for
23 notifying voters about ID issues with their ABBMs
24 since the March primary?

25 A. No.

1 Q. Okay. I am going to show you a document
2 which, I believe --

3 MS. PAIKOWSKY: Are we on JCS3 3; is that
4 right?

5 MR. BRYANT: 3, 3?

6 MS. PAIKOWSKY: So, you had done -- you had
7 done two exhibits. One was marked JCS1 -- one was
8 marked JCS2 and the other one was 13.

9 THE WITNESS: That was from --

10 MR. BRYANT: And I also -- I also added 9.

11 MS. PAIKOWSKY: And you added 9.

12 MR. BRYANT: But I believe that the -- I
13 assume you're trying to keep the -- not duplicate
14 exhibit --

15 MS. PAIKOWSKY: Yeah, numbers. Should I
16 just start --

17 MR. BRYANT: -- numbers. And I believe the
18 last one that I have marked is 13.

19 MS. PAIKOWSKY: 13.

20 MR. BRYANT: So, if you start with -- yours
21 with 14, we ought to be okay.

22 (Exhibit 14 was marked.)

23 MS. PAIKOWSKY: All right. So, we're going
24 to call this JCS3, 14. There you go.

25 THE WITNESS: Thank you, ma'am.

1 MS. PAIKOWSKY: I have copies for you both,
2 and a copy for you as well.

3 MS. CUBRIEL: Thank you.

4 Q. BY MS. PAIKOWSKY: Okay. Do you recognize
5 this document?

6 A. Yes, ma'am.

7 Q. So, I will represent that this document is
8 well over a thousand pages long, so what we have here
9 is an excerpt. It is the first page and the 840th
10 page. Can you explain to me what this document is.

11 A. Sure. This is a list -- well, by code of
12 the people who requested a mail ballot app- -- a mail
13 ballot from May 25th, which was after the primary
14 runoff until 10/28, which was the deadline for
15 accepting applications for the November 2022
16 election.

17 Q. Can I have you look at the fourth name from
18 the bottom.

19 A. On what page?

20 Q. On the -- on page 840 of -- again, this is
21 Exhibit JCS3 14.

22 A. I'm going to go to George Rigley?

23 Q. Yes.

24 A. Yes.

25 Q. Okay. And can you explain to me what V3

1 status means?

2 A. Huh-uh. I'm sorry. V3? No, I don't have
3 the list of codes with me. I'm sorry.

4 Q. That's okay.

5 A. No, it's not. I apologize. I feel badly.

6 Q. Yeah, we can -- we can perhaps leave a
7 space in the transcript, and if you want to provide
8 that information --

9 A. Okay. Cool.

10 Q. -- on the back end; is that okay?

11 A. Uh-huh.

12 MR. BRYANT: Yeah.

13 MS. PAIKOWSKY: Wonderful. Okay.

14 INFORMATION REQUESTED: _____

15 _____
16 MS. CUBRIEL: Can we go off -- go off the
17 record real quick?

18 THE VIDEOGRAPHER: The time is 12:57 p.m.
19 and we are off the record.

20 (Off-the-record discussion.)

21 THE VIDEOGRAPHER: The time is 12:59 p.m.
22 and we are on the record.

23 Q. BY MS. PAIKOWSKY: Okay. Has your office
24 ever referred a voter whose ABBM or carrier envelope
25 did not match -- actually, withdrawn.

1 Since the March primary, has your office
2 ever referred a voter whose ABBM or carrier envelope
3 did not match their TEAM record, or their ID did not
4 match, to the office of the secretary of state as a
5 potential case for voter fraud?

6 A. No.

7 Q. Has your office ever made a similar
8 referral to the AG's office?

9 A. For this year?

10 Q. Correct. For the reason --

11 A. Right. Yeah.

12 Q. Have you ever referred -- withdrawn.

13 Has your office ever referred a voter
14 because their ID number on their ABBM or carrier
15 envelope did not match their TEAM record to the AG's
16 office as a potential case of voter fraud?

17 A. No.

18 Q. Has your office ever referred a voter
19 who -- whose ID number on their ABBM or carrier
20 envelope did not match their TEAM record to the
21 county DA's office as a potential case of voter
22 fraud?

23 A. No.

24 Q. Why not?

25 A. Because you -- usually when we see that,

1 when -- when we see that, it's -- it's usually a
2 human error where either the voter, as they were
3 putting it down, transposed two numbers. Or as we
4 say, as the processor entering it, fat-fingered it
5 and -- and put in a different number.

6 So, I mean, they get a second look if they
7 don't, and that's where we catch the -- the human
8 error.

9 Q. Did your office make any referrals for any
10 other instances of potential voter fraud to any of
11 the groups mentioned: the secretary of state, the
12 attorney general or county DA or any other law
13 enforcement during the November 2022 general
14 election?

15 A. No.

16 Q. Sound of silence, crossing out questions.
17 So, hopefully that's a good thing.

18 So based on your experiences in the
19 November 2022 general election, do you have concerns
20 about implementing SB-1's identification provisions
21 during a presidential cycle?

22 A. Yes.

23 Q. Why is that?

24 A. Because we will be dealing with a new group
25 of potential voters who are not familiar with the

1 process.

2 Q. From your experiences implementing
3 Senate Bill 1's identification provisions in the
4 November 2022 election, do you believe that the size
5 of an election can impact the burden of
6 administering that ID provision?

7 A. Yes.

8 Q. In what ways?

9 A. The -- the -- I don't want to say the
10 larger the election but, like, the higher profile,
11 let's maybe say that, with the candidates and the
12 more candidates. What we find -- and -- and again,
13 I'm speaking for a large county, for -- for a large
14 county, and while, again, SB-1 has tied our hands in
15 the ability to distribute the state ABBMs, or our --
16 our -- our form, they've tied our hands.

17 And so, many more consultants that the
18 candidates hire have started to fill that void. And
19 it's an education process for the consultants where
20 we've brought them in. Because for so many years
21 their format was the same. You know, the glossy
22 picture here, and then down at the bottom it would
23 have a vote-by-mail card with someone's name and then
24 a blank one to give to someone.

25 Well, they can't do that anymore because

1 now it's under SB-1. It's a huge concern for
2 identity theft because now we're giving them the
3 name, the address, the birth date, signature and an
4 identifier. And so, the consultants have had to
5 figure out a way to do that in a tri-fold,
6 something -- they just have to redesign it, which is
7 more expensive, obviously, for them and for the
8 candidates.

9 And so, to answer your question, I foresee
10 that there will be a lot more need to educate from
11 the consultant standpoint. And -- and what I mean by
12 the SB-1, the one thing that has drastically tied our
13 hands is the provision in there that we are -- we are
14 only allowed to give one ABBM out to the person who
15 requested it.

16 And that's -- again, it's -- it's muddied
17 the waters. Because before, we would hand out 25 to
18 somebody or, you know, let them work their precinct,
19 let them work -- and -- and we can't do that anymore.
20 But yet we knew when we had the ability to provide
21 that ABBM, it was everything we needed, everything
22 was protected. It would come back to us.

23 So, again, we're watching this morph over
24 to where it's becoming a more, dare I say, commercial
25 venue for consultants and printers and -- and

1 everything else, so.

2 Q. Would you say that -- withdrawn.

3 So if I understand your testimony, it is
4 that after SB-1, consultants and others play a larger
5 role in disseminating ABBMs; is that right?

6 A. That's -- yes. That's why -- the smart
7 way. Thank you. You worded it well.

8 Q. Do you believe that the fact that these
9 consultants are now having to play a larger role in
10 disseminating ABBMs hinders your ability to engage in
11 voter education efforts?

12 A. No. I think we'll just have to be more
13 proactive.

14 Q. Would you say the fact that your office
15 cannot disseminate ABBMs yourself adds confusion to
16 the process for voters who are trying to comply with
17 SB-1's identification provisions?

18 MR. BRYANT: Objection to form.

19 THE WITNESS: It's just a matter of them
20 getting the form from us.

21 Q. BY MS. PAIKOWSKY: Okay. Did your office
22 receive any communications from voters indicating
23 that they did not plan to vote by mail in the
24 November 2022 general election but otherwise would
25 have liked to?

1 A. Yes. There were -- I mean, there were --
2 again, there were phone calls, and that's mainly
3 how -- we have one of those automatic phone systems,
4 and I know everybody hates those. What do they call
5 them, the tree? Push this number. Push this number.
6 Push this number.

7 And ours has been very successful because
8 it's 24/7, and it has a little mailbox in it that
9 says, if you're requesting a mail ballot application,
10 please leave your name and your number and address
11 and we'll mail it out.

12 And so, I have a staff member every morning
13 and they come in and they're going to take all the
14 information out off that mailbox. It could be a
15 hundred. It can be 200 names. And, I mean, they'll
16 spend the morning just addressing these.

17 Well, now, because of the confusion that we
18 can only send one, you know, this -- this is David,
19 you know, 2:00 in the morning, would you please send
20 three applications to my home. Here's the address
21 blah, blah, blah, blah, for my wife, myself and my
22 son. Can only send one.

23 So when we send one, or if they're on the
24 phone and actually speaking with someone and they
25 say, I need an application for myself, my son and my

1 daughter, there's -- there's a tendency at times for
2 the voters to flair. They're -- they're angry at us.
3 We're -- we're complicating their lives.

4 And I will share with you, I -- I don't --
5 I can't quantify it. I can't give you a number. But
6 it became so -- so, very, very emotionally charged.
7 I -- I'm trying to say this correctly. But for the
8 first time in -- in -- in my elections administration
9 and with my staff, some of whom have been with me for
10 20 years, I was able to instruct my staff this time
11 to tell people on the phone dealing with this
12 situation that I don't deserve to be spoken to like
13 that. I'm ending this call. Never in my existence
14 have I had to say that.

15 But when my staff is being denigrated and
16 being spoken to in such ugly, ugly words. You know,
17 God doesn't love you anymore. You know, you're the
18 spawn of the devil. I mean, the -- the terms that
19 they had to live through. So, yes, it happened. I
20 can't quantify it, but that's a direct result of
21 SB-1.

22 Q. Compared with the 2018 mid-term election,
23 did the number of ABBMs you received during the
24 November 2022 elections increase, decrease or stay
25 about the same?

1 A. They were about the same.

2 Q. So, earlier you mentioned that VOTEC tracks
3 slightly different data with respect to ABBMs and
4 carrier envelopes than does TEAM. What fields
5 relevant to SB-1's identification provision are
6 different between VOTEC and -- and TEAM?

7 A. Again, I can't specify exactly what numbers
8 they are. But we know that we would be sending up
9 information that we had this many people apply, we
10 were sending them -- that we have this many ballots
11 back. Or, you know, that this application failed or
12 was rejected, and it was not flowing into their
13 ballot tracker.

14 And many of the large counties had this
15 same feeling. And the State was putting a lot of
16 emphasis, and they did a whole lot of outreach, for
17 people to use the ballot tracker. Use the ballot
18 tracker. But the ballot tracker didn't work for
19 the -- we call ourselves the offline counties.
20 There's online counties and then there's offline
21 counties.

22 And then that became, again, a little
23 bit -- they fixed it a little bit. As I said, when
24 we did, I think you used the word synch, David, where
25 we received some TDLs and that from the State from

1 DPS when they worked with DPS and -- and then they
2 pushed them back down to us.

3 So, again, there's just a lot of
4 information and due diligence between the vendors and
5 TEAM. Everybody's working to do a great job. And
6 it's just, they're finding out that when we have this
7 code and this one says, one, two, three, and you're
8 saying, four, five, six, and when we send it up to
9 have it happen overnight digitally, they're not
10 matching.

11 Q. You mentioned earlier that voters in
12 Bexar County could use Bexar County's ballot tracking
13 system. In the November 2022 general election, is it
14 your understanding that Bexar County voters could
15 access the State ballot tracking system and cure
16 portal?

17 A. They were told to do that, yes. They were
18 told to do that. But it was mainly, they were
19 unsuccessful. In the course of the ballot tracker,
20 the State's ballot tracker. In the course of the
21 November 2022, we -- we were notified -- okay.

22 The -- the State doesn't notify -- I -- I
23 used that word wrong, because they don't notify us.
24 Part of the -- the symbiotic relationship we have is
25 that, again, we export, it goes up there, based on

1 what the vendor says, and then we import it based on
2 what they say. And then every day, every single day,
3 we -- I and two of my staff members, sign into the
4 secretary of state TEAM portal. We -- we have
5 administrative. And so, you get in there and say,
6 okay.

7 And they call it the dashboard. Okay. And
8 the dashboard is there and it lists probably 20 or 25
9 different functions. And it will give us a number
10 in -- in the dashboard of how many people -- okay. I
11 got -- I try this every single day, and the first
12 number you see is how many canceled. Well, we send
13 them up, and they were canceled from other counties.

14 And so, we get a list of that. Ours is
15 usually around 4,000. Then it's -- you have a list
16 of possible felons. You have a list of possible
17 deceased. You have a possible rejected. They're
18 not -- they're not going to go. You have a -- you
19 have numbers that they miss live check, that when
20 they sent it through DPS and SSN, it was rejected,
21 none of those numbers.

22 And so, that's what the staff works on.
23 You pull this down every day. And these are the
24 exceptions. We may send up 10,000 records and
25 they'll say, okay, we'll accept 6,000. Push them in.

1 Go work these and find out what's wrong. And so, in
2 the election, the first capture at the top is ballot
3 cures. Here's their ballot tracker and they put that
4 at the very top of the dashboard.

5 And in the course of the November 2022
6 election, we only got 16 ballot tracker numbers that
7 people had worked in there and cured them, and then
8 they actually sent us those, but we know we had a
9 whole lot more people trying it. And so, that's my
10 indication.

11 But, again, it's -- they don't come to us
12 and actively do this. I hope I'm making myself
13 clear. If -- you know, we have to do it every day.
14 And if we don't do it, or we skip a day or somebody's
15 busy, okay. But it's -- it's called the dashboard,
16 and it's part of your daily -- your daily checks and
17 balances if you're an offline county.

18 Q. Earlier we discussed that a ballot could be
19 rejected for multiple reasons. Do you have a sense
20 of how common multiple defects are?

21 A. Not multiple. Not -- not multiple. It's
22 usually just one before we -- before we saw SB-1, you
23 know, because now it could be no identifies, no
24 signature. Oh, no, this and, you know. And so,
25 it's -- it's -- SB-1 brings us multiple.

1 Q. Even after SB-1, how frequent would you say
2 multiple ballot defects are?

3 A. Very rare.

4 Q. Is there a way that we could find out the
5 frequency from your own internal tracking?

6 A. No. Because, again, our -- our internal
7 tracking, much like the State's, we don't have a box
8 for multiple. And -- and, you know, once we open
9 that up and we say, okay, no signature (whoosh
10 sound), it's gone. It doesn't stay there so that you
11 could say, okay, no ID. Does that make sense? And
12 so, I -- I don't have a function that I could say
13 multiple.

14 Q. I'm wondering, earlier you described a
15 neutral form that you said had many check boxes on
16 it.

17 A. Uh-huh.

18 Q. Is that a way that you can record multiple
19 defects?

20 A. Yes.

21 Q. And is that document something that's been
22 disclosed in discovery?

23 A. No, because we don't keep copies of it.

24 Q. I see.

25 A. I mean, so -- but somebody sits here and

1 you say, okay, this is it. I have yours, check,
2 check, check, fold it up, put it in the envelope and
3 it's gone. Or you know -- or -- or if
4 that's necessary, then maybe that's what we're going
5 to have start doing. I mean, you know, it can be
6 done. It's going to be another step. It's going to
7 be another...

8 But, again, you know, we have -- her name's
9 Lisa. Lisa sits at the reject table, and -- and as
10 they work through the ABBMs, or they work through the
11 ballot, they give it to Lisa. She's got her generic
12 form. She goes dah dah dah, folds it up, puts it in
13 the envelope. We don't keep that. But, you know, if
14 I -- if I'm seeing a need...

15 Q. You do review those paper forms with the
16 checks on it, though, internally?

17 A. No, Lisa does it.

18 Q. The -- the royal you. So, the office of
19 the Bexar County Election Administrator does review
20 these neutral forms that can record how often
21 multiple defects exist?

22 A. Correct.

23 MS. CUBRIEL: She's not referring to me, by
24 the way.

25 THE WITNESS: Royal?

1 MR. BRYANT: Let the record reflect.

2 MS. CUBRIEL: Well, you keep saying "Lisa."

3 THE WITNESS: Lisa.

4 MS. CUBRIEL: I'm assuming you're referring
5 to a Lisa within your office.

6 THE WITNESS: Yeah, I have two Lisas, and I
7 have a guardian angel here, Lisa, yes. Yeah, I'm
8 sorry. I didn't even think of that. I had my back
9 to you. I won't do that anymore. I can see Lisa.
10 She sits right there at that table in the corner.

11 Q. BY MS. PAIKOWSKY: So, just for the record,
12 the Bexar County Election Administrator's office does
13 review these forms that can account for how often
14 multiple defects arise and did so during the November
15 of 2022 general election?

16 A. I don't have a copy of those.

17 Q. Now, all --

18 A. Lisa -- Lisa checked them, yes.

19 Q. Wonderful. Thank you. Okay. So, are you
20 aware of what the statewide rejection rate was?

21 A. No. No, ma'am. What was it?

22 Q. Would you be surprised to learn that the
23 statewide rejection rate was reported as 2.7 percent?

24 MR. BRYANT: Objection as to form.

25 THE WITNESS: No.

1 Q. BY MS. PAIKOWSKY: Why do you think your
2 county's rejection rate was lower than the statewide
3 rate?

4 A. Because I'm proud of our insert and the
5 work we did.

6 Q. Do you think that other counties have the
7 same level of resources and expertise as Bexar County
8 to implement the kinds of interventions you
9 discussed?

10 MS. CUBRIEL: Objection; form.

11 THE WITNESS: I had made reference to that
12 before that, you know, prior to 2020, I would have
13 answered, yes. But since we've had such a turnover
14 in election leadership, I -- I think it's really hard
15 for a new person to get all the nuances and
16 understand how you have to touch your voters.

17 Q. BY MS. PAIKOWSKY: Do economic resources
18 factor into county's ability to implement the kinds
19 of solutions you did in Bexar County in November of
20 2022?

21 A. I would say absolutely.

22 Q. So, earlier, you mentioned that the
23 November 2022 general election ran more smoothly than
24 the November 2020 election. Can you describe more
25 about why that was.

1 A. Again, just sheer numbers. It -- it -- it
2 basically was just a numbers thing. Because as we
3 talked about mainly, you know, the mail ballots, when
4 you're dealing with 124,000 going out and 92,000
5 coming back, our office, because we do, we handle
6 everything in house, every single piece of it is
7 handled in house, in 2020 my office, we were -- we
8 were working two shifts. We didn't have to do that
9 in 2022.

10 In 2020, we were, I think, since you had
11 asked, we did, like, 1,200 voters that we had --
12 workers that we had to put out there. Well, in
13 2022 -- or 2020, because we expected more voters, we
14 had more workers. And so we were, like, at 1,800.

15 And so, that's what I'm speaking to, the
16 more complexities, it's -- takes longer to get 1,800
17 people than it does to get 1,200. It takes longer to
18 do 124 applications than it does to do 40.

19 Q. And in the differences between the
20 November '22 general election and the November '20
21 general election, would you say that COVID-19 also
22 impacted the smoothness of one election as compared
23 to the other?

24 A. No, because we had that figured out prior
25 to that November.

1 Q. Do you believe that the November 2022
2 general election was smoother than the 2018 general
3 election?

4 A. No. They were the same.

5 Q. Okay. As compared to the 2018 general
6 election, was mail voting more difficult in the 2022
7 general election? And I'm referring to both
8 processing mail ballots and voter education.

9 A. Yes.

10 Q. Why is that?

11 A. With the ID requirement. The new -- you
12 know, the new -- relatively new ID requirement that
13 we didn't have in prior elections.

14 Q. Was there any information that would have
15 been useful to administering mail voting in the
16 general election that was not captured in the TEAM
17 database?

18 A. No. My initial reaction would be, no. But
19 in hindsight, during this back and forth -- I mean,
20 if -- if you were looking for multiples, you know,
21 maybe we would open up that for multiples. But as an
22 administrator doing the election at the time, no.

23 Q. Does your county keep any data on ABBM
24 rejections that is not reflected in TEAM?

25 A. No.

1 Q. Does your county keep any data on carrier
2 envelope rejections that is not reflected in TEAM?

3 A. No.

4 Q. I think that is all my questions.

5 MS. PAIKOWSKY: I would like to go off the
6 record if that's okay for just maybe five minutes and
7 we can chat and then come back on.

8 THE VIDEOGRAPHER: The time is 1:27 p.m.
9 and we are off the record.

10 (A brief recess was taken.)

11 THE VIDEOGRAPHER: The time is 1:33 p.m.
12 and we are on the record.

13 MS. PAIKOWSKY: And I am going to pass the
14 witness at this time.

15 MR. GENECCIN: Thank you.

16
17 EXAMINATION

18 BY MR. GENECCIN:

19 Q. Good afternoon, Miss Callanen.

20 A. Good afternoon, sir.

21 Q. My name is Victor Genecin.

22 A. Victor. I said, "Dennis." I'm sorry.

23 Q. And I've got a few questions for you. Just
24 a little while ago, when you were answering
25 Ms. Paikowsky's questions, you cited the number

1 \$218,000. And am I correct that that's the amount of
2 additional funds that your office had to spend on the
3 general election in 2022 to deal with issues related
4 to mail-in voting?

5 A. Correct.

6 Q. And that additional expenditure was
7 occasioned by the ID provisions of SB-1; is that
8 right?

9 A. Yes, that -- that was part of it. Yes,
10 sir.

11 Q. And is -- is there any other part of it?

12 A. No. We -- we had the equipment. I mean,
13 as I said, we -- everybody got two screens --

14 Q. Uh-huh.

15 A. -- but we happened to have those, so we
16 were okay on that.

17 Q. So, you didn't have to spend --

18 A. Technology.

19 Q. -- extra on the two screens. The 218 was
20 how much you had to spend on personnel; is that --

21 A. Yes, sir.

22 Q. Yeah. And do you anticipate having to make
23 similar expenditures, similar additional
24 expenditures, in future elections in connection with
25 those ID provisions?

1 A. Yes, sir.

2 Q. And so, those -- that expenditure would be
3 higher in a presidential election year? Does that --
4 would that be fair to say?

5 A. Yes, sir.

6 MR. BRYANT: Objection; form.

7 Q. BY MR. GENECHIN: And would it be fair to
8 say that that -- that that might be a lower amount
9 than an off year?

10 A. Yes.

11 Q. Okay. Was there a fraud problem with
12 mail-in ballots in Bexar County that, in your mind,
13 justified the need to spend an additional \$218,000 or
14 so in each future election?

15 A. No, sir.

16 Q. Were you aware of a fraud problem with
17 applications for mail-in ballots in Bexar County at
18 all?

19 A. No, sir.

20 Q. And back before SB-1, when you had the
21 ability to give out multiple applications for ballots
22 by mail, was there a problem with fraud with that?

23 A. Not to my --

24 MR. BRYANT: Objection to form.

25 THE WITNESS: Not to my knowledge.

1 Q. BY MR. GENECHIN: Was there any problem of
2 fraud in Bexar County that you believe was addressed
3 by any provision of SB-1.

4 MR. BRYANT: Objection; form.

5 THE WITNESS: Not to my knowledge.

6 Q. BY MR. GENECHIN: Now, I understand that for
7 the 2020 election you did not adopt 24-hour voting in
8 any of your centers; is that right?

9 A. That's right.

10 MR. BRYANT: Objection as to the scope of
11 the question not being limited to the general
12 election.

13 Q. BY MR. GENECHIN: Would you want to be free
14 to adopt 24-hour voting if you thought that the
15 voters of Bexar County needed it?

16 MR. BRYANT: Same objection.

17 THE WITNESS: No, sir. No, sir.

18 Q. BY MR. GENECHIN: Okay. And why not?

19 A. Because I have much, much respect for our
20 election officials, and it would be an undue burden
21 for our officials.

22 Q. Okay. Now, you mentioned that there were
23 voters who were unable to vote in the general
24 election in 2022 because they presented their
25 driver's license on their cell phone.

1 A. Yes, sir.

2 Q. And I believe you said that there was, I
3 forget what the word was you used, but there was
4 friction between your election workers and young
5 people who wanted to present their ID on -- on cell
6 phones; is that right?

7 A. To a point. I did -- I -- I take exception
8 when you said they did not get to vote. They voted
9 provisionally.

10 Q. Okay.

11 A. So, I -- I would like to correct it so
12 that -- that we understand that.

13 Q. So -- so, people who presented their ID on
14 cell phones were -- were given provisional ballots?

15 A. Yes, if -- if -- if -- between the
16 dialogue, if they were not willing to go back home
17 and get their original or go out to their car to get
18 their original and they wanted to vote right then,
19 then the only way to vote was a provisional. But --
20 but some of them just said, oh, okay, I'll go get and
21 come back.

22 Q. And do you have a sense of how many left
23 without -- without voting a provisional ballot?

24 A. No, I can't quantify that.

25 Q. Okay. And could you -- are you able to

1 quantify how many left and then came back?

2 A. No, sir.

3 Q. Okay. Now, focusing for a moment on poll
4 watchers. Do you believe that there were any issues
5 of fraud in the 2022 general election that poll
6 watchers exposed in Bexar County?

7 A. No.

8 Q. I believe you testified last year that you
9 considered the training that was provided to poll
10 watchers to be a joke.

11 A. Correct.

12 Q. Do you remember that testimony?

13 A. Oh, absolutely.

14 Q. And in preparation for the general
15 election, was the same training given to poll
16 watchers?

17 A. No, they -- they did adapt it.

18 Q. And was the poll watcher training still a
19 joke?

20 A. Yes, sir.

21 Q. And why was that, in your view?

22 A. Again, the first time it was just them
23 listen -- listening to -- or it's not a PowerPoint.
24 I don't know what it's called, but it has sound. But
25 it's -- the sense of it, was just, like, a video they

1 listened and no qualifiers did -- did they complete
2 it and there -- it was nothing. They just had their
3 certificate.

4 And then when we made our feelings known,
5 the -- they updated the PowerPoint to, then, ask some
6 questions after the -- whatever, like, the segment
7 and then there would be a couple questions, there
8 would be a segment and a couple questions. But at no
9 time did it have to pass -- you know, you have to
10 have a 70, you have to have a 75. There was -- there
11 was absolutely no metrics with it, that -- it's,
12 like, okay if we sat here and completed it, here's
13 your certificate. So, it still was not anything that
14 we compared to our election officials.

15 Q. So, it's your understanding that a person
16 could take the poll-watcher training and respond to
17 the questions, and respond to the questions
18 incorrectly and still pass the poll watcher?

19 A. Keep going. Yes, sir.

20 Q. In connection with the general election,
21 did you lose election judges because of concerns
22 about poll watchers?

23 A. Yes, sir.

24 Q. Did you lose other election employees?

25 A. No, not full-time staff. No.

1 Q. Did you lose poll workers?

2 A. Yes.

3 Q. So, is it your testimony that there were
4 people who were experienced election judges,
5 experienced alternates, experienced election clerks,
6 who stopped working with you during the 2022 election
7 because they were concerned about poll workers?

8 A. Yes, sir.

9 Q. About poll watchers?

10 A. Yes, sir.

11 Q. And were there individuals who had been
12 election judges, alternates and election clerks who
13 ultimately did not decide not to work with you but
14 who needed persuasion and encouragement in order to
15 stay with you?

16 A. Yes.

17 Q. And are you able to estimate the amount of
18 time that you needed to put in to encouraging people
19 to remain with you despite the poll watcher
20 provision?

21 A. Again, I can't quantify it, but it was very
22 necessary, on a one-on-one basis. I mean, when you
23 have one of your better election officials tell you
24 that they're not -- no longer going to work now
25 because the poll watcher is going to be following

1 them back in at night or be following them on early
2 voting and they're not going to be run off the road
3 by somebody. I mean, that is a longer
4 conversation --

5 Q. Yeah.

6 A. -- that you have to have.

7 Q. Now, the conversation about being followed
8 after leaving the polling site, was that a
9 conversation that occurred before or after the 2022
10 general election?

11 A. It -- it occurred before because their
12 experience in March colored their -- the perception
13 to be able to work in November.

14 Q. And so, would you say that the practice of
15 poll watchers following election judges, alternates,
16 election clerks after the day's work was over was the
17 principle problem that your election officials had?

18 A. No.

19 MR. BRYAN: Objection --

20 Q. BY MR. GENECHIN: No? What was it --

21 MR. BRYANT: -- and that the question
22 doesn't distinguish about the time as to whether it
23 pertains to the general election or some prior
24 election.

25 THE WITNESS: The -- the following of the

1 poll watcher -- the poll watcher following, that's
2 been on the books for -- forever. But it's because
3 we have much more astute, I hate to say activist poll
4 watchers, that were engaging -- trying to engage
5 voters in -- in the polls.

6 And, again, the biggest thing we heard was
7 from our officials at night where they felt like we
8 were going to get angry with them because it was
9 taking them longer to come in because they were being
10 held up by the poll watchers who were demanding to
11 see this and write this serial number down and do
12 this. And so, that was the larger of the complaints.

13 Q. BY MR. GENECHIN: How were the poll watchers
14 trying to engage with voters?

15 A. Again, everything I'm able to say is
16 ancedotally when we would have our After Action
17 Report. But we would have judges tell us that the
18 poll watchers in some -- I mean, again, this is not
19 everything. This is just in -- in a room with them
20 sharing their stories that, you know, make sure and
21 check that you've got the right -- right -- your
22 ballot says exactly who you wanted because you know
23 these machines have been messing up, and things like
24 that and just intimidating them and making them
25 frightened.

1 And so -- and the election officials would
2 tell them, you know, you can't talk to the voters.
3 You're not supposed to talk to voters. But by then,
4 no harm, no foul. It's already happened, and so.

5 Q. Right. What instructions did you give your
6 election judges, alternates, election clerks in
7 connection with the general election of -- of 2022
8 concerning where poll watchers were permitted to be
9 within the polling places?

10 A. Well, again, the information -- the printed
11 information they had their election judges handbook
12 from the secretary of state. We provided them with a
13 poll worker -- poll watcher handbook so that they
14 could see any of the -- the laws up close and
15 personal.

16 And here in Bexar County, we have what's
17 referred to, and I'm very proud of it, is we call it
18 the pink note. It's Jackie's Pink Note, Lessons
19 Learned, which we hand to every election official on
20 election day from the lessons learned in early
21 voting.

22 So, we give them tips. Be careful of this.
23 Make sure you watch this. And so, at numerous times,
24 we go over and tell them again, this -- this is
25 changed. They now can -- can -- can do this. They

1 can now watch this. Because, again, prior to SB-1,
2 the rule was, they could sit or stand quietly to
3 observe.

4 But after that, it's been, they can move
5 around and observe wherever they want. And that --
6 that was difficult for some of our tried and true
7 election officials who had been with us for a long
8 time.

9 Q. And when you say they could move around,
10 were they able to move around in the area where
11 voters were voting?

12 A. Yes, sir.

13 Q. And before -- before I forget, I'm going to
14 ask you two different questions. Before I forget,
15 the -- your -- your pink note --

16 A. My pink note.

17 Q. Your pink note for the November general
18 election, has that been produced?

19 A. I don't think so. I don't know. I -- I --
20 y'all would have to check.

21 Q. All right.

22 MR. GENECHIN: Well, Lisa, if it hasn't
23 been, I'll make the request that --

24 MS. CUBRIEL: I don't think it was -- I
25 don't know that it was specifically asked for. I

1 didn't know of its existence --

2 THE WITNESS: I don't know.

3 MS. CUBRIEL: -- until you told me about it
4 just now in this deposition, so.

5 MR. GENECHIN: All right.

6 THE WITNESS: I'm sorry. We always get
7 pink notes. Okay. So, you want the November 2022
8 pink note?

9 Q. BY MR. GENECHIN: Yes, please.

10 A. Okay.

11 Q. And now I'm going to ask you if you would
12 describe what the setup looks like in a -- in a
13 polling place in terms of -- of machines. Are there
14 what I would think of as voting booths? That is a
15 place you go in and you close the curtain around you,
16 nobody can see you.

17 A. I wish, no.

18 Q. Okay. You wish. So, you don't have those?

19 A. No, sir.

20 Q. What -- what do you have, in terms of the
21 setup for -- for voters?

22 A. Okay. They -- when the voter enter, they
23 go to the qualifying table that we had talked about.
24 And that has the laptops and it has the printers and
25 it has where they sign in and it's all the forms, all

1 the legalese, everything that has to happen before
2 they can go vote.

3 Then they go around the corner and we
4 provide tables. And they're approximately -- well,
5 this -- this smaller table, they're not quite this
6 long, and it takes two of our -- we have express
7 votes, and we tell the voters and everybody, it's
8 just a big pencil. All it's doing is marking your
9 ballot.

10 And that express vote is tilted back and
11 it's large and it has a nice screen on it. And then
12 it has a -- a bonnet. We call it a bonnet, which is
13 the privacy shield that -- that sits around it. But
14 it -- it's not the curtain. It's not a complete
15 privacy.

16 And so, the election officials will put two
17 of these on a table, separate them, put them on a
18 table side-by-side. And then, as I had said before,
19 sometimes we'll have eight in a room. And so,
20 they'll put four tables around with two and two and
21 two with the bonnets.

22 They try and turn the -- the screens, like,
23 to the wall so nobody out here can see what they're
24 doing so that they have that privacy. And like --
25 like here, they would be here and then walk that way

1 (indicating).

2 And so -- and then at -- per -- and by the
3 exit, they would go out is the actual voting machine.
4 It's a large -- it's called a DS 200. It has the
5 tabulator on top. And I get in trouble all the time,
6 because I call it a big trash can. It looks exactly
7 like the big trash cans we use here in Bexar County,
8 and they insert their ballot. The ballot, then, is
9 actually tabulated and it falls down in the bottom
10 into a locked area, and then they exit the -- the
11 poll site.

12 Q. Okay. So --

13 A. Three steps.

14 Q. So, in terms of that step two, the express
15 vote is essentially, it's a -- a computer kind of
16 machine?

17 A. Uh-huh.

18 Q. And it's got a bonnet over it?

19 A. Yes, sir.

20 Q. And there are two on a table. So, if a
21 person is sitting at one of them and another voter is
22 sitting at the other one, they can't look over each
23 other's shoulders --

24 A. Correct.

25 Q. -- and see what they -- what -- what --

1 who they're --

2 A. Hopefully, so.

3 Q. Hopefully, because they're not completely
4 screened?

5 A. Correct.

6 Q. Okay. And is it possible for the poll
7 watchers to walk behind these voters?

8 A. It is now. Yes, sir.

9 Q. And is that permitted?

10 A. Yes, sir. It is now.

11 Q. And have you had voter complaints about
12 poll watchers looming behind them?

13 A. Yes, sir, we have.

14 Q. Do you know about how many?

15 A. Again, you know, I -- I've taken -- believe
16 me, I've taken some very angry people, phone calls.
17 But, again, you know everything -- we -- when we do
18 our after actions, it's an informal after action.

19 And so, you know, our officials will tell
20 us -- somebody will make that statement and then
21 all of a sudden all these other hands go up and, you
22 know, they're -- they're ready to tell us their
23 experience and then their experience. But then at
24 some time we're like, okay, we -- we get that part.
25 Let's move on, you know.

1 And so, again, I -- I -- I hate that I have
2 to keep saying I can't quantify anything. But I have
3 an implicit trust in my poll workers and in our
4 election officials. Some you just feel like they're
5 family they've been there so long and you trust them,
6 and it's difficult to have them be uneasy.

7 Q. Okay. And these after actions, do your
8 election workers submit any written reports to you in
9 connection with those after actions?

10 A. Very rarely.

11 Q. Okay.

12 A. Very rarely.

13 Q. And the after action meetings themselves,
14 does somebody take notes of what's being said?

15 A. No. I mean, all of these things, you know,
16 I -- I -- I feel inadequate because I never --
17 it's -- it's never crossed my mind to take minutes or
18 to videotape them or to make copies of our rejection
19 sheets. I mean, it's -- it's -- it really is -- I
20 guess that's a word I can say, is I feel inadequate
21 because that's not what we're doing it.

22 We're doing it in -- in an -- in an
23 atmosphere where we trust them, they trust us. We
24 joke. We say, you know, what's said here -- it's
25 like Las Vegas, what -- what's said here, it stays

1 here. And so, everybody is very, very outgoing, and
2 they're in a nonthreatening venue. They are among
3 friends and people who would consider family.

4 So, our goal is to capture as much
5 information as we can to be able to say in the pink
6 note, or it's -- at the next election, please be
7 aware, you'll have people trying to cross your
8 100-foot mark. Please be aware you have, you know,
9 overactive campaign workers. Please be aware, and
10 that kind of stuff.

11 Q. So, in -- in terms of -- of where
12 information that you have gained in those after
13 action meetings gets turned into writing, it would be
14 in the pink note?

15 A. Yes, sir.

16 Q. Anyplace else?

17 A. No.

18 Q. Okay.

19 A. I mean, you know, handwritten notes as
20 you're sitting there talking but then they get thrown
21 away.

22 Q. Okay. Do you know how many election judges
23 you lost before the 2022 general election because of
24 those individual's concerns about poll watchers?

25 A. Probably -- probably close to 20 percent

1 because we did -- we also -- again, please
2 understand, we have our early voting sites.

3 Q. Uh-huh.

4 A. And again, per the code, as a vote center
5 county, if we have this building as a -- as an early
6 voting center, then it's required to be an election
7 day site. So, if you've been there for two weeks,
8 12 days, then the voters know to go there, so you
9 have to be there.

10 And I had -- I -- we had a -- had a couple
11 of our election officials in November specifically
12 that completed early voting and then let us know at
13 the end that they weren't going to do election day.
14 They -- they -- they couldn't take it anymore. They
15 just -- they -- they were exhausted, mentally and
16 physically stressed. They weren't going to do it.
17 So, you know, we -- we put somebody else in there.

18 Q. And that -- when you say "a couple," was
19 it -- was it two? Or was it more than two?

20 A. It was a few more.

21 Q. Okay. And those individuals, were they
22 judges, alternates or clerks?

23 A. The way it usually happens, sir, is that
24 those groups are really tight-knit. They trust each
25 other. They know how to handle it. So, if the

1 election judge says they're not working, nobody else
2 will work.

3 Q. So --

4 A. So -- so when you lose one, it's -- you
5 know, if the clerk says they're not working, we can
6 put in another clerk. But normally, if the head
7 judge says, I -- I -- I can't, I can't, I can't, then
8 we'll lose that entire crew.

9 Q. So, at the end of early voting, how many
10 election centers did you have where you had to
11 replace the whole crew because they all left?

12 A. I think in November we had four.

13 Q. Four. And was the reason that was given to
14 you concerning those four the same reason for all
15 four or was it different reasons?

16 A. They -- the same with a few little
17 differences.

18 Q. Okay. And what was the reason?

19 A. Again, they were physically and emotionally
20 exhausted is -- is the bottom line on it, that --
21 that it was -- it was too much.

22 Q. And what about it was too much for them?

23 A. For them it was the additional poll watcher
24 that -- that -- that caused a number of them to
25 really -- because normally, they'll go in and is --

1 you know, and we say they all have their specific
2 job. They watch this. They watch that. And now all
3 of a sudden while they're doing this job they have to
4 keep watching this person that's roaming around.

5 And it just -- it -- it doesn't take them
6 off task, but I think you understand what I'm saying.
7 It's adding an additional stress to them.

8 Q. Right.

9 A. And they just said -- and, you know, of
10 course, we respect that and we tell them they've done
11 their duty, they've done, you know, a great job for
12 us and we respect that and we'll see you next time.

13 Because that prefaces it first. Because
14 while they want to take election day off because they
15 feel they just can't handle it on election day, they
16 don't want to lose their spots. They don't want to
17 leave us hanging. There -- there's that real core
18 group. We're a family. And that discussion comes
19 first. You know, that's how they start the
20 discussion, I don't want to let you down but I don't
21 see how I can -- and we're like, we respect that.

22 Q. And how about in advance of the
23 commencement of early voting for 2022, did you have
24 people who were your experienced poll watchers who
25 said, just can't do it this time?

1 A. No, but our experienced ones, to your
2 point, asked us, can we have extra people --

3 Q. Uh-huh.

4 A. -- going into this. We know we're going
5 to need extra people. I'm going to -- I know I'm
6 going to have to stand somebody by that exit. I know
7 I'm going to have to. And we're like, fine. We'll
8 support you however we can, and they know that
9 happens.

10 Q. So, would it be fair to say that for an
11 election the size of 2022 you had more people
12 staffing the centers --

13 A. Yes.

14 Q. -- than you had in earlier like elections?

15 A. In the last like election, yes, sir --

16 Q. Yeah.

17 A. -- we did.

18 Q. And that was because of SB-1?

19 A. Yes, because the poll work -- poll watcher
20 part of SB-1.

21 Q. And did you have people, election judges,
22 alternates, clerks come to you after the election was
23 over and say to you in substance, Jackie, I didn't
24 want to let you down. I went through the whole
25 election but now I'm done. I can't do it anymore?

1 A. Yes --

2 MR. BRYANT: Objection to form.

3 THE WITNESS: -- we did.

4 Q. BY MR. GENECHIN: People you were sorry to
5 lose?

6 A. Absolutely. Anyone who we lose we are
7 sorry to lose.

8 Q. And about how many of those were there?

9 A. A handful.

10 Q. But all together, I think you said a few
11 minutes ago that -- that you lost about 20 percent of
12 your election judges?

13 A. Yes.

14 Q. And that -- to the poll watcher provision;
15 is that right?

16 A. To -- again, to poll watcher provisions, to
17 the campaign workers outside, to the -- how do I word
18 it? Some voters came in and they were already angry
19 that they -- that -- just the whole perception of the
20 national narrative, they were coming in angry, and
21 they hadn't had to deal with this before.

22 And that was an unusual piece of this
23 election. The angst that it produced took a toll on
24 the people who were there and, you know, smiled and
25 wanted to welcome these people and help these people,

1 and then all of a sudden you're getting somebody,
2 argh, argh, argh, argh, that's growling at them as
3 they're handing their, you know, ID over to them.
4 So, again, it -- it had a different tone.

5 Q. And -- so now to change the topic just a
6 little. You testified back a year ago, little less
7 than a year ago, that the secretary of state's office
8 had not provided a handbook for election judges.

9 A. It's true.

10 Q. Did they -- did that office get a handbook
11 to you for election judges in advance of the 2022
12 general election?

13 A. Yes.

14 Q. Okay. But am I correct that that handbook
15 did not include material concerning poll watchers?

16 A. It had -- it had a synopsis. But again,
17 that's why we -- I felt compelled to give them the
18 complete handbook of the poll watcher. These are the
19 rules that they should have, so take a minute to read
20 these, you know.

21 Q. Did you give your election judges any
22 guidance concerning how close a poll watcher could
23 get to a voter?

24 A. No.

25 Q. And did you give them any guidance

1 concerning how to deal with the problem of poll
2 watchers walking behind voters?

3 A. Again, we tried -- we tried to give them
4 best practices when -- when we saw them.

5 Q. Have you had any communications with the
6 secretary of state's office concerning the poll
7 watcher problems that you heard about from your
8 election judges and election workers?

9 A. No.

10 Q. Has the secretary of state's office reached
11 out to you and sought your input on the poll watcher
12 issue?

13 A. No.

14 Q. Does Bexar County collect any data
15 concerning the race of voters?

16 A. No, sir.

17 Q. And am I correct that the State does not
18 either?

19 A. Maybe. Sort of.

20 Q. Okay.

21 A. We disagree with the methodology, and I
22 don't want to keep sounding negative. But there are
23 consultants that -- we talked about the consultants
24 that campaigns have. They have fantastic databases
25 where they do ethnic and language and all this.

1 But the secretary of state's office once
2 every two -- two years, and we have the
3 constitutional amendment election that will come up
4 this November, the odd number year in November, and
5 when those amendments are proposed and, again, we --
6 we use the phrase legalese, the language of them is
7 legalese, the secretary of state's office is mandated
8 to send a translation of the amendments in -- in a --
9 in a -- in a little booklet that says, if there's
10 three pros, then there's three cons against this
11 amendment, if there's three and three.

12 But they are required to send that in
13 Spanish to Spanish households. And so, they have
14 some group, some program, I couldn't tell you the
15 name of it, where it gathers the Hispanic last names,
16 the surnames, and that's who they mail them to.
17 Which, again, is -- is not a good system. Because
18 when we -- then that goes out and we get calls, why
19 did somebody mail me this in Spanish. I don't read
20 Spanish. I don't know Spanish. Why did blah, blah,
21 blah, blah.

22 So -- but there is some kind of program
23 that the State -- now, whether they would use that to
24 follow voting trends, I -- I can't speak to that.
25 But I know that once every two years they do mail to

1 Hispanic surnames through some kind of program
2 that -- that needed translations.

3 Q. And other than the identification of voters
4 who have Spanish surnames, is there any other data
5 collected by the State concerning the race of voters?

6 A. Not to my knowledge.

7 Q. Okay.

8 A. We don't collect it when we put it in the
9 voter registration card.

10 Q. Okay. Now, you testified in April of last
11 year that your office has written ADA policies?

12 A. Uh-huh.

13 Q. Does your office still have written ADA
14 policies and practices and procedures?

15 A. Yes.

16 Q. Okay. And you testified back then that
17 those policies included how to handle a request for
18 reasonable modifications?

19 A. Yes.

20 Q. Do you remember that testimony?

21 A. Yes.

22 Q. Do your ADA policies, practices or
23 procedures still include how to handle requests for
24 modifications?

25 A. Yes.

1 Q. Okay. Have your policies, your ADA
2 policies, changed since your deposition in April of
3 2022?

4 A. No, but yes --

5 Q. Okay.

6 A. -- because we had that lawsuit. That --
7 that would be the only thing. And I don't know how
8 that would fit into the answer for you. But we did
9 send by e-mail those three ballots --

10 Q. Uh-huh.

11 A. -- to the visually impaired. But that's
12 not in our policy because it's not approved by the
13 State of Texas. So, it's not Texas election code, it
14 came from the federal judge to do this, but until
15 that goes further or we hear again, remember I said
16 it's not over yet --

17 Q. Right.

18 A. -- it's not policy. So, I don't -- I
19 don't want to give you the wrong answer, but --

20 Q. Right. So, you have- --

21 A. -- it's in flux.

22 Q. Right. Apart from that issue, there have
23 been no changes; is that fair?

24 A. Correct.

25 Q. Okay. Do you train your staff on your

1 office's ADA's -- ADA policies, practices and
2 procedures?

3 A. Yes, sir.

4 Q. And how often do you conduct that training?

5 A. Probably once a year.

6 Q. All right. And what was -- when was the
7 last time you did a training?

8 A. It would have been before the November
9 election.

10 Q. Okay. Do you recall --

11 A. October, probably. Beginning of October.

12 Q. Okay. And what training do your employees
13 receive for dealing with a reasonable modification
14 that's requested for the vote-by-mail process?

15 A. We haven't had those.

16 Q. Okay. So, you haven't had a request?

17 A. No, sir.

18 Q. Okay.

19 A. I mean, the -- the application has the --
20 the space for them to request a mail ballot due to
21 disability, but they don't have to tell us what the
22 disability is. There's -- there's -- there's
23 absolutely no other piece. They don't have to send
24 us anything or prove it. They just mark disability
25 and we send them the mail ballot just like we do

1 anyone else. So, it's not an accommodation. It's an
2 awareness, I guess.

3 Q. You haven't had requests from people to
4 allow them to apply for a mail-in ballot some other
5 way than by --

6 A. No, sir.

7 Q. -- providing you with a form? Okay.

8 And how about training concerning your ADA
9 policies, practices and procedures for the voting
10 process itself?

11 A. We handle that --

12 MR. BRYANT: Objection; form.

13 THE WITNESS: -- through the elect --
14 through our training.

15 Q. BY MR. GENECHIN: Okay. And are employees
16 trained concerning denials of requests for
17 modification in the voting process?

18 A. No. I don't -- no.

19 Q. Okay. Now, when you were deposed back
20 in -- in April of 2022, you testified that your
21 office's written ADA policy -- policies, practices
22 and procedures didn't include how to identify what
23 discrimination against a disabled person looks like.
24 Do you recall that testimony?

25 A. Correct.

1 Q. And have your written ADA policies,
2 practices or procedures changed since your last
3 deposition to add information regarding information
4 to identify discrimination against persons with
5 disabilities?

6 A. No, sir.

7 Q. Okay. And in your testimony in April of
8 2022, you testified that you didn't know if your
9 office's written ADA policies included handling
10 grievances or complaints regarding the ADA. Do you
11 recall that testimony?

12 A. Correct.

13 Q. And do you know now if you're...

14 A. We haven't made any changes to it. No.

15 Q. Okay. And -- and this is a question,
16 though, that goes to your -- your knowledge of what
17 the policies contain. So, are you -- you're still
18 not sure what -- what -- what the policies say
19 about -- about handling grievances?

20 A. Right.

21 Q. Okay. In April of 2022 you testified that
22 your office did not have an elections ADA
23 coordinator.

24 A. Correct.

25 Q. Since your deposition, has your office

1 hired or named a person --

2 A. No, sir.

3 Q. -- for that role?

4 A. No, sir.

5 Q. And you said in April of 2022 that you were
6 the person in your office responsible for monitoring
7 compliance with the ADA. Is that still true?

8 A. Yes, sir.

9 Q. Do you provide any training concerning the
10 ADA to election judges, clerks or other poll workers?

11 A. Yes, sir.

12 Q. And when was the last such training done?

13 A. 2020, before -- before 20- -- Novem- --
14 general of 2020.

15 Q. Okay. So, you haven't given any ADA
16 training to your election judges, alternates or
17 election clerks since 2020?

18 A. Correct.

19 Q. Okay. And between 2020 and the general
20 election of 2022, are there new people in the jobs of
21 election judge, alternate and election clerk?

22 A. Sure. We had between, like we talked
23 about, attrition and those that didn't...

24 Q. So those new -- the new people in those
25 roles have not had ADA training?

1 A. That's fair to say. Yes.

2 Q. Okay. All right. And -- and you testified
3 in -- in April of 2022 that you made inquiries to the
4 secretary of state about providing modifications to
5 election policies, practices and procedures for
6 voters with disabilities. Do you recall that
7 testimony?

8 A. Yes.

9 Q. And since April of 2022, have you made any
10 further inquiries to the secretary of state?

11 A. No.

12 Q. Has the secretary of state provided any
13 guidance to you in writing regarding the ADA since
14 March of 2022?

15 A. No.

16 Q. And in advance of the November 2022
17 election, did your office receive requests for
18 reasonable modifications from voters with
19 disabilities?

20 A. Again, I -- I had said we -- we made -- had
21 appointments made for our ASL, our Deaf Link, and we
22 had numerous appointments made during early voting
23 and election day. And you know, I'm -- I'm sitting
24 here -- I'm still uncomfortable with the part for our
25 ADA training.

1 I -- I need to remind you, or bring --
2 bring to your attention that the voting system we
3 have, the ES&S system, anyone who works with us, for
4 us has to go through equipment training.

5 Q. Uh-huh.

6 A. Okay. Well, the equipment training, a
7 majority of that is spent on ADA accommodations
8 because the system that we have has so many
9 enhancements on it.

10 So, I don't want to lead you just, well,
11 we're ignoring that. We're not, because it's part of
12 it because they have to be trained on, here's where
13 the headsets go in. Look, here's the button if you
14 want to enlarge the font. Look, here's -- here's the
15 Braille. Here's -- I mean. So, all of that is
16 brought to their mind. I mean, in every piece that
17 they're doing.

18 And then we have -- as i said before, we
19 have the whole process where we take the curbside
20 unit out to the car for the disabled. And so, again,
21 while we're not giving them the total disabled --

22 In -- in -- in 2020, before the
23 presidential, what we do, what we call our disabled
24 training, we go out to our community and we -- we
25 bring in disabled people for our training sessions.

1 And they're the ones that speak to them --

2 Q. Uh-huh.

3 A. -- as far as as how to guide them, where
4 to handle them, where to touch their elbow, how to
5 speak to them, how to get down on this level --

6 Q. Uh-huh.

7 A. -- not to talk to the aide. I mean, we --
8 we do all of that in person. So -- so, we have that
9 right before the presidentials. But maybe I'm
10 hearing you say we should do it every -- every year.

11 But it seems like I said, since we got the
12 new equipment in 2019, because it has all the
13 enhancements on it, it feels like we're doing a lot
14 of that in our equipment training --

15 Q. Right.

16 A. -- because this has just so many more, that
17 word, enhancements.

18 Q. Okay. Good. And -- and so, now focusing
19 on the question of requests for accommodations.
20 You've told me about the accommodation that was
21 requested by deaf voters and -- and the way that your
22 office made arrangements for them to have
23 interpretation by appointment.

24 A. Well, that was for the visually imp- -- no,
25 ASL. You're right.

1 Q. Right.

2 A. That was for the deaf. Yep.

3 Q. And -- and so now, I guess my question is,
4 were there any other requests for modifications from
5 any other groups of disabled persons in advance --

6 A. Well, again --

7 Q. -- of 2022?

8 A. -- the -- the -- the lawsuit that was
9 filed in the district court from the visually
10 impaired, that wanted the e-mail ballots so that they
11 could screen scrape it --

12 Q. Right.

13 A. -- and vote in there. So, that would be
14 the other one that I know.

15 Q. Right.

16 A. And that's still ongoing.

17 Q. And as far as you know there are no others?

18 A. Yes.

19 Q. Okay. And in advance of the November 2022
20 general election, did you put out any notices or
21 other communications to the public pertaining
22 specifically to the effects of SB-1 on voters with
23 disabilities?

24 A. No, sir.

25 Q. Okay. Are you aware of voters with

1 disabilities whose application to vote by mail in the
2 November election were rejected?

3 A. No.

4 Q. And have any ADA grievances been filed with
5 your office since you last testified in April of
6 2022?

7 A. I don't think so. I mean, if a grievance
8 is a lawsuit, I -- I don't know what -- what your
9 differentiation would be.

10 Q. Okay. But the -- the lawsuit is the one
11 that -- the one that you might characterize as a
12 grievance that you know about?

13 A. Yes, sir.

14 Q. Okay. Did your office notify voters who
15 put in an absentee ballot when that ballot was
16 rejected, that it was finally rejected?

17 A. Yes.

18 Q. And how did you notify them of that?

19 A. Again, that is a function of the early
20 ballot board. The -- that team of party people --

21 Q. Uh-huh.

22 A. -- they were the ones -- again, like I
23 said, they made the final determination on rejecting
24 a ballot. And so, they are then charged with sending
25 out the letters and the notices and they have,

1 basically, up to two weeks after the election, per
2 the code, to send those final notices out.

3 And so, again, I don't -- I can't speak to
4 how many they sent. That's a separate group. We
5 have a special room for them. They're in there and I
6 think that's sort of like the best part of the whole
7 election code.

8 Our office is charged with processing and
9 sending them out, and then we don't touch them, as
10 far as except -- you know, the -- except the early
11 ballot board, and that's when they reject them
12 because they are the instrument that rejected them,
13 then they are the ones that are charged with sending
14 the notice.

15 Q. And does the early ballot board keep its
16 own records?

17 A. Yes.

18 Q. And so, is -- is that entity known as the
19 early ballot board of Bexar County?

20 A. Yes, sir. Yes, sir.

21 Q. And do they have records of notification
22 sent to individuals who's to tell them that their
23 effort to cure in 2022 was ineffective?

24 A. I would hope so.

25 Q. Okay. Are you aware of any voters who were

1 dissuaded from voting by mail because of the
2 identification provisions in SB-1?

3 MR. BRYANT: Object to the extent that
4 is -- covers a period other than the general election
5 in 2020.

6 MR. GENECHIN: Thank you, sir. I appreciate
7 that.

8 Q. BY MR. GENECHIN: Yes, in connection with
9 the general election in 2022, are you aware of any
10 voters who were dissuaded from voting by mail because
11 of the identification provisions of SB-1?

12 A. Yes. But I -- like, I -- I -- I couldn't
13 identify them because -- for instance, what comes to
14 mind when you ask that -- that question, Victor, is,
15 those phone calls where we would take the phone call
16 and someone would say, send me an -- please send me
17 an application for myself and my -- my wife, or
18 please send me one for my husband and we'd say, well,
19 we can only send you one. May we speak with them on
20 the phone? Well, they're not here. You can't speak.
21 We need to hear them ask for it.

22 And then they would yell at us that it was
23 our fault and we weren't going to do anything and
24 that they're not going to vote anyhow, and they'd
25 slam down the phone. So, again, that -- we can't

1 quantify that. But did it happen? Absolutely, it
2 happened.

3 Q. And to shift the focus again, I'm sorry to
4 do that, but -- but to shift the focus again, I
5 believe you testified that -- that -- that you
6 couldn't say whether there were poll watcher issues
7 in all 41 of your voting centers?

8 A. Correct.

9 Q. Are you able to estimate how many of the
10 centers had poll watchers?

11 A. Well, I think all of the sites had poll
12 watchers at -- at one time.

13 Q. Uh-huh.

14 A. Again, because of the law in early voting,
15 they can come and go as they want. And so, we know
16 that -- like, you would be a poll watcher, you would
17 be assigned to three sites. And so, in the course of
18 the day, or maybe you wouldn't hit that next site the
19 next day.

20 But every site at some point had a poll
21 watcher. Every site did not have a poll watcher the
22 entire time it was open. Does that make sense?

23 Q. Right. I mean, but I would hope that --
24 that if the poll watcher were me, there wouldn't be
25 any poll watcher problems and you wouldn't be getting

1 calls about it.

2 A. Right.

3 Q. So the question sort of goes to the issue
4 of -- of the poll watcher problems that you are aware
5 of. Were you aware of poll watcher problems at
6 certain sites?

7 A. Yes.

8 Q. And what -- what were those sites?

9 A. And again, they would be our busier sites.
10 They -- they -- this -- this -- it's an economy of
11 scale. If -- if -- like, Brookhollow is our main
12 site and they have a wrapped around and they know
13 they're going to be there, well, then they're going
14 to have a poll watcher all -- all day, all the
15 time.

16 If you go to East Central, where they do a
17 hundred people a day, you're -- you're going to have
18 a poll watcher there for part of the day, but then
19 they're not going to be there. They're going to, you
20 know, either go up or spell somebody.

21 So, it -- not only -- it -- everybody --
22 every day we publish, we're required to publish, how
23 many voted at every site. And so, the candidates who
24 appoint the poll watchers are astute. I mean, they
25 know, well, this site's going to have a lot more

1 voters. So, if they're going to be busier, you need
2 to be there.

3 Q. Did you get calls about poll watcher
4 problems at Brookhollow?

5 A. No.

6 Q. Can you tell me which polling places you
7 received calls about poll watcher problems?

8 A. McCreless Library jumps -- jumps into --
9 Las Palmas library, jumps into my mind immediately.
10 Great Northwest, they -- they had problems, but they
11 made a couple phone calls to us. And I think
12 Great Northwest, Las Palmas, McCreless and, oh, God,
13 Schaefer. Schaefer's that other one. Schaefer
14 Library.

15 Q. Okay. Let's -- let's take them one at a
16 time. What were the problems that you recall being
17 reported to you by your election workers at McCreless
18 Library?

19 MR. BRYANT: Objection. Can we -- are all
20 of these questions related only to the general
21 election --

22 MR. GENECHIN: Yes, sir.

23 MR. BRYANT: -- of 2022?

24 MR. GENECHIN: Yes.

25 Q. BY MR. GENECHIN: Let's -- let me -- let me

1 just state with -- as a preface to this, that if I
2 fail to say with regard to the 2022 election, I
3 intend to -- to -- to limit the question to that
4 period.

5 So, first with regard to the McCreless
6 Library, what were the problems during the 2022
7 election that were reported to you by the poll
8 watchers?

9 A. Before I get into the -- the detail,
10 detail, I'd like to just sort of back up a little
11 bit. Because the first and second day of early
12 voting, we received tons of calls from our early
13 voting sites questioning the appointment, the actual
14 certificate, that the poll workers were coming in
15 with.

16 Q. Is that the poll workers or poll watchers?

17 A. Poll watchers.

18 Q. Okay.

19 A. When the poll watcher appears for service,
20 they have a certificate that has their name appointed
21 at the top, and then the candidate who was appointing
22 them and the candidate's signature. And then at the
23 bottom, when they -- when they come into a -- like I
24 said, to appear for service, they are to take that
25 certificate and sign it in front of the election

1 official to prove that that's the validation, that it
2 matches the signatures that at the top where they
3 were appointed.

4 Well, the first day and the second day we
5 were inundated with calls because it was a statewide
6 candidate that had appointed the poll watchers. And
7 all of these were copies. None of these were
8 originals.

9 And so, our election officials were, this
10 isn't a wet signature. Can I accept it? Should I
11 accept it? It's not -- it's a fax. It's a fax copy.
12 Can I accept it? Can I accept it?

13 And at that point, again, to remind me, I
14 did call up to the State and say, we're getting
15 these. And they were like, no, no, take them.
16 They're fine. But that --

17 Q. Who was that, by the way, that you called?

18 A. That -- that would have been Christina. I
19 would have asked for Christina Adkins.

20 Q. Christina Adkins at the secretary of
21 state's office?

22 A. Yes, yes, because that was new to us,
23 because they were getting -- you know, the -- and we
24 saw that then through election day, because this same
25 candidate had -- had just blanketed Bexar County.

1 Q. And who was that candidate?

2 A. I knew as soon as I said that -- Evans.
3 Evans. And probably 40 percent of the poll watchers
4 we had in Bexar County were appointed by Evans.

5 Q. Uh-huh.

6 A. And so, once that settled down and we told
7 them, then -- then that was okay, that -- that they
8 could -- they could accept that. Then we got into
9 the phone calls later on about, well, they're
10 talking -- they're -- they're talking to the voters.
11 You know, the ones where they asked to see the voters
12 vote, make sure you check it. Make sure because that
13 machine's been messing up.

14 Those kinds of issues started with -- at --
15 at those particular sites where they were interacting
16 with the voters. Las Palmas has an awful lot of
17 Spanish-speaking voters there. And so, that was part
18 of -- part of the problem there.

19 Q. What was the problem?

20 A. Them asking to have some -- the poll
21 watcher was asking the election official to translate
22 for them to the voter, where they're not supposed to
23 have any interaction with the voter anyhow.

24 And so, they were going to the election
25 officials because the election officials speak

1 Spanish and asking them, well, you -- you need to go
2 over there and check and you need to go tell him
3 that, blah, blah, blah, blah, blah.

4 And so it was like, we're not doing this.
5 And so then they would call us and ask us for help.
6 And it was -- it was things like that.

7 Q. Uh-huh. Anything else that you remember
8 about any of these polling places?

9 A. No, other than, again, we -- we did have
10 some of our -- I don't want to say -- okay. 2020 --
11 November 2022, we were what we thought free of the
12 COVID. We still provided all the PPE and all of that
13 for our election officials.

14 And so, we had -- one of the sites that
15 they felt very strongly that they were going to have
16 their masks on and they were going to have their face
17 shields on, and they were very upset that the poll
18 watchers were not respecting the six-foot mark.
19 They -- they wouldn't stay six feet away from them.
20 And so, we were taking continuous calls from that
21 site.

22 Q. Which site was that?

23 A. And so, again, the -- the poll watchers
24 were just -- you know, they were right there.
25 That -- that was our -- McCreless. They -- and,

1 again, I have to respect my election officials if
2 that's -- and we told them, you don't have to use the
3 PPE, but we're providing it for you. It's at your
4 own discretion.

5 And -- but they didn't feel there was that
6 respect of them. Is that -- is that a way to word
7 it? And so, you know, they -- they took issues.

8 Q. So, you described a little bit about the
9 demographics of Las Palmas. Can you summarize the
10 demographics of the other three polling places that
11 you told me about?

12 A. McCreless, I would say would be somewhat
13 Hispanic, not -- not -- not like Las Palmas.
14 Las Palms is the heart of the Democratic party
15 Hispanic -- Hispanic people. And East Central -- did
16 I give you East Central?

17 Q. You didn't.

18 A. And we need to add Converse to that because
19 Converse is the one where Candy said that she wasn't
20 going to be able to judge anymore because they were
21 going to run her off the road coming in. And
22 Converse is in northeast Bexar County. So, I don't
23 know the demographics. I mean, I just know where we
24 have a real concentration of the Spanish-speaking
25 ones.

1 Q. Okay. And who is Candy?

2 A. She was -- she was the judge at the --
3 Converse.

4 Q. And what is her full name?

5 A. I knew as soon as I said it I was, like,
6 Jackie, you screwed up. I have no idea right now
7 what her last name is. I can --

8 Q. Can we leave a blank in the transcript and
9 you can fill it in.

10 A. Okay.

11 INFORMATION REQUESTED: _____

12 _____

13 MS. CUBRIEL: Those are the other two --

14 THE WITNESS: Yeah.

15 MS. CUBRIEL: -- that you mentioned out of
16 the four?

17 THE WITNESS: Yeah. Okay. I'm sorry.

18 Schaefer is -- again, it's on the east side and

19 mainly -- mainly one of our open spaces, ranches. I

20 mean, you know, there -- it's not a whole lot of

21 residential by it. And then the Great Northwest is

22 in the west side of town. So, obviously northwest.

23 And the demographics are, I would say mainly Anglo.

24 But again, they -- they were not respecting the COVID

25 because they were -- they were managing that also.

1 Q. BY MR. GENECHIN: Okay.

2 (Exhibit 15 was marked.)

3 MR. GENECHIN: I'm going to ask the reporter
4 to mark this as JC3, I believe we are up to
5 Exhibit 15?

6 (Off-the-record discussion.)

7 MR. GENECHIN: We will pass this. Do you
8 need to mark it or?

9 THE REPORTER: Oh, no, that's -- it's fine.
10 I'll just get it later.

11 MR. GENECHIN: Okay. And I'll pass these
12 down to counsel. And I'm sorry, Lisa, if you want to
13 have a look.

14 THE WITNESS: This is that one where they
15 put seven in a car, seven or more. Yeah.

16 Q. BY MR. GENECHIN: Yeah. Okay. Do you
17 remember this form?

18 A. Uh-huh.

19 Q. Look -- look at it carefully, please.

20 A. Uh-huh.

21 Q. And just tell me if you remember this form.

22 A. Absolutely.

23 Q. And what is it?

24 A. It's the new form that came out right
25 before the November election about getting the

1 information of the person who was driving the van to
2 bring voters to the poles.

3 Q. All right.

4 A. And it's for seven or more.

5 Q. And --

6 A. I think we talked about this earlier too.

7 Q. Right. Do you remember your office using
8 this form?

9 A. Absolutely.

10 Q. Did you provide training about the use of
11 this form?

12 A. Absolutely. And again the training was --
13 and it threw us. If -- if you look at the form it
14 says, "A person that provides transportation to seven
15 or more voters to a polling place." It doesn't say
16 at one time.

17 Q. Uh-huh.

18 A. And that's what -- what threw us. But I --
19 I have two of these forms that said they -- they did
20 provide seven or more but they took that as one time.

21 Q. And -- and --

22 A. With, like, a big van. One of those big --
23 big -- big vans.

24 Q. Did the two that you have, have you
25 produced those?

1 A. No.

2 Q. Well, again, we will request that they be
3 produced. Now, there's something -- something about
4 this form that I'd like you to have a look at. Does
5 it say anything about curbside voting?

6 A. No, it does not.

7 Q. And am I correct that the rule about
8 filling in this form is limited to people who are
9 providing transportation to seven or more for
10 curbside voting?

11 A. That's our understanding.

12 Q. Okay. So, this form would appear to
13 suggest that anyone who's transporting seven or more
14 for any voting should have to fill it out?

15 A. Right.

16 Q. And did you have any issues or -- or -- or
17 problems about requests to fill out the form for
18 people who were transporting seven or more people but
19 not for curbside?

20 A. Not to my knowledge.

21 (Exhibit 16 was marked.)

22 Q. BY MR. GENECHIN: I'm going to show you what
23 I've marked as Exhibit -- Exhibit JC3, 16.

24 A. This is a different -- this is the original
25 form, and then they changed it. This one was what

1 they put out immediately after. And this says for
2 curbside voters. The first one --

3 MS. CUBRIEL: Okay.

4 THE WITNESS: -- and then they changed it
5 into curbside out. I'm sorry. I'm talking to her.
6 I apologize.

7 Q. BY MR. GENECHIN: Well, why don't you say to
8 us what -- what -- what you said to -- to Lisa.

9 MR. BRYANT: Excuse me. Could you please
10 pass a copy to me.

11 MR. GENECHIN: Oh -- oh, I'm sorry. Here
12 you go.

13 MR. BRYANT: Thank you.

14 MR. GENECHIN: There you go.

15 MS. PAIKOWSKY: It's fine.

16 Q. BY MR. GENECHIN: Okay. What's the
17 difference between Exhibit JC3, 15 and Exhibit 16?

18 A. 15 is the updated version of 16. And the
19 way you can tell, every form we get from the
20 secretary of state has up in the upper left-hand
21 corner the date that it was put into existence. And
22 so, 16 came January of 2022. And then it was
23 replaced with seven of 2022.

24 And if you look at the two documents, in
25 the original document it has a person who

1 simultaneously provides transportation to seven or
2 more curbside voters.

3 And then this -- this one they redid, the
4 bottom of it says, "A person that provides
5 transportation to seven or more voters to the polling
6 site." It -- it's removed the word "curbside."

7 Q. So, if I'm following you, the secretary of
8 state's office got the form right originally?

9 A. Correct.

10 Q. And then in July they changed it and got it
11 wrong?

12 A. Well, again, that's our understanding. I
13 can't -- I can't go quite that far and say that, but
14 I can tell you that it's been amended.

15 Q. All right. And -- and the amendment does
16 not mention curbside voting?

17 A. Correct.

18 Q. Right. Do you know why this form was
19 amended?

20 A. No, sir. I have no knowledge of that.

21 Q. Have you had any discussion with anybody at
22 the secretary of state's office about the amendment?

23 A. No, sir.

24 Q. Do you know which version of this form you
25 used in the general election of 2022?

1 A. I'm going to pray that we used the updated
2 version, but I can't guarantee that without going
3 back and checking. I apologize. But, yeah,
4 that's -- that's -- again, it looks the same at the
5 top. It has the same prescribed by and the same
6 sections, but the dates are different.

7 Q. Okay.

8 A. We have a 1/2022 and a two and -- and
9 they've changed the bottom of it. Every --
10 everything else -- no, I take that back. They did
11 change -- they -- they did change the -- the -- the
12 block up here in the beginning because this one has
13 Chapter 64, Subchapter (b).

14 Q. When you say, "this one," which one are you
15 talking about?

16 A. Oh, I'm sorry. I'm sorry, sir. The
17 January one, the original one in -- in the block.

18 Q. Okay. The original one is Exhibit 16;
19 right?

20 A. Yes. Yes, sir. And it says, "Assistance
21 to a voter under," and then it lists that Chapter 64,
22 Subsection (b) in addition to. That's the language
23 that we had to take off of the mail ballot envelopes.
24 That's -- that's whatever that lawsuit was that they
25 had to make a new one.

1 So, they've taken that off. And that
2 language is not here, the -- the Exhibit 15, they've
3 stricken the part Subchapter (b) off of that.

4 Q. Okay.

5 A. Because this -- this -- the newer
6 version says, under Section 64.034. But the older
7 version has Chapter 64, Subchapter (b) in it. And
8 so, I defer to all you attorneys that you would know
9 what happened and why that changed. But that was the
10 change, sir.

11 Q. And then, I would like to show you a
12 document that was marked earlier today as JC3,
13 Exhibit 2, and that's the election reconciliation --

14 A. Okay.

15 Q. -- official totals document. Put that
16 back in front of you.

17 A. Okay. I have a copy here.

18 Q. Oh, okay.

19 A. Excuse me.

20 Q. Now -- and this document shows the total
21 voters at Box E and the total ballots counted at
22 Box M; is that right?

23 A. Yes.

24 Q. Yes. And so, would it be fair to describe
25 the Box E amount as turnout?

1 A. Yes.

2 Q. Okay. And how does that turnout for the
3 November general election compare to the most recent
4 like election?

5 A. Fairly close.

6 Q. All right. And this document does not
7 show -- and -- and when you say "fairly close," I --
8 I think you may have the numbers for us. Can you
9 tell us what those were for 2018?

10 A. I didn't add them up. I'm sorry. No,
11 the -- I only have the by-mail. That -- that --

12 Q. Oh.

13 A. I don't have -- I can -- I can go online.
14 We have all of this online.

15 Q. All right. Well, there's no need to do
16 that now. But the -- the by-mail --

17 A. Excuse me.

18 Q. -- the by-mail turnout --

19 A. Uh-huh.

20 Q. -- for 2022 was 39,655 voters?

21 A. Ballots mailed out.

22 Q. Right.

23 A. And 32,564 counted.

24 Q. Counted. And how does that compare to
25 2018?

1 A. We mailed out 44,000 and counted 39,000.

2 Q. Now, this form doesn't show the total
3 applications --

4 A. Correct.

5 Q. -- from ballots by mail; is that right?

6 A. Correct.

7 Q. Okay. And so, it doesn't give an
8 indication of how many applications for ballot by
9 mail were rejected?

10 A. Correct.

11 Q. Okay. Do you know how many applications
12 for ballot by mail were rejected --

13 A. No, sir.

14 Q. -- in November of 2022?

15 A. No, sir.

16 Q. Okay. Why not?

17 A. They didn't go into the system. They --
18 we -- we didn't have a code to put them in the
19 system.

20 Q. Who was responsible for rejecting those
21 applications?

22 A. The -- the -- the mail staff, the temporary
23 mail staff as they came in.

24 Q. And did they notify the voters that their
25 application for --

1 A. If possible.

2 Q. -- was --

3 A. If possible.

4 MR. GENECHIN: Okay. If we could take a
5 brief break, we'll see if there's anymore. Let's go
6 off the record.

7 THE VIDEOGRAPHER: The time is 2:52 p.m.
8 and we are off the record.

9 (A brief recess was taken.)

10 THE VIDEOGRAPHER: The time is 3:05 p.m.
11 and we are on the record.

12 MR. GENECHIN: Miss Callanen thanks very
13 much for your testimony today. I will pass the
14 witness.

15 MS. PAIKOWSKY: And on the record, the
16 United States will just state that we have conferred
17 with the other parties in the room and consented to
18 file Exhibit JC3, 14 under seal.

19 THE WITNESS: Thank you.

20 THE REPORTER: Are you asking a few more
21 questions, Victor?

22 MR. BRYANT: Yes, I do have a few more
23 questions. I'm going to exchange places with counsel
24 and then we'll get those done.

25

1 FURTHER EXAMINATION

2 BY MR. BRYANT:

3 Q. Miss Callanen we looked a moment ago at
4 what had been marked as JC3, Exhibits 15 and 16. Do
5 you recall that?6 A. Yes, sir. Is that the one from January to
7 July?

8 Q. Right.

9 A. Okay.

10 Q. Do you recall that there was a further
11 revision of this form by the secretary of state that
12 was sent to you and other election authorities in
13 Texas in approximately October of 2022?14 A. I can't speak to that. I'm not -- I'm not
15 sure. I can go back and look. But in October, we
16 are going guns to the wall.17 Q. Okay. And do you know whether or not the
18 form that is JC3, 15, which has the date up in the
19 upper left-hand corner of 7/2022 --

20 A. Uh-huh.

21 Q. -- was or was not used in the general
22 election in 2022?23 A. I can't swear to it, but I would assume --
24 I hate that word -- that we did use that seven --
25 that 7/22 form. Because by October, we have all of

1 our kits made and all -- and all of that and early
2 voting opened up, you know, by the 20th of October,
3 the 19th of October. So, I -- I would be pretty sure
4 that we used the 7/22.

5 Q. Okay. Is your answer there based on a
6 recollection or --

7 A. Right.

8 Q. -- on logic as to what was going on in
9 October?

10 A. Logic.

11 Q. Okay. All right. And --

12 A. Did the one in October go back and say
13 curbside?

14 Q. I'm advised that -- that it went back and
15 said curbside in October of -- of --

16 A. '22.

17 Q. -- '22. But, obviously, I have no -- no
18 knowledge and can't testify to that myself. Okay.
19 We looked at JCF [sic], Exhibit 2 --

20 A. Yes, sir.

21 Q. -- which was the election reconciliation
22 form --

23 A. Yes, sir.

24 Q. -- for the general election in 2022. To
25 the best of your knowledge, are the numbers that are

1 on that exhibit correct?

2 A. Yes, sir.

3 Q. Can you identify the signature that is
4 about two-thirds of the way down on the left --

5 A. Sure.

6 Q. -- on Exhibit 2.

7 A. That's the presiding judge of the central
8 counting station, Ms. Rosemary Dehoyos.

9 (Exhibit 3 was marked.)

10 Q. BY MR. BRYANT: I'd like for you to look at
11 what's been marked as Exhibit JCS [sic] 3. Can you
12 tell me what that is.

13 A. It's the secretary of state list of the
14 counties. I don't see where it starts with Bexar.
15 It starts with a C, and I -- it doesn't have a first
16 page, so I can't tell.

17 Q. I think --

18 A. But it's some kind of percentages. Like,
19 it has 314 and then 14. So, maybe it's the list of
20 provisional ballots that each county had? I don't
21 know, but it doesn't have a first page on it, sir.

22 Q. Okay. And I'll tell you that that is
23 because of poor stapling by me. And somewhere down
24 there the -- it has -- we have a complete one. So --

25 A. Was I right? Was it provisional ballots?

1 No.

2 Q. No.

3 A. No. I tried.

4 (Exhibit 3A was marked.)

5 Q. BY MR. BRYANT: I'm going to remark this
6 as JC3, 3A and hand you Exhibit JC3, 3A. Can you
7 tell me what that is.

8 A. Ballots by mail accepted, ballots by mail
9 rejected off of the TEAM system.

10 Q. And did you see -- do you see Bexar
11 County --

12 A. I do.

13 Q. -- on that? And is the information
14 reflected as Bexar County correct for --

15 A. Yes, it is.

16 Q. -- the general election in 2022?

17 A. Yes, sir.

18 Q. Thank you. All right.

19 (Exhibit 4 was marked.)

20 Q. BY MR. BRYANT: Let me show you what has
21 been marked as --

22 A. I never looked at this.

23 Q. -- Exhibit JCF -- JC3, 4.

24 A. I'm sorry. You know what, where did you
25 find this? I want to get a copy of this. One county

1 had one mail ballot. I'm sorry. I'm sorry.

2 Q. Okay.

3 A. Yeah. Yes.

4 Q. Can you identify the Exhibit JC3,
5 Exhibit 4?

6 A. Yes, sir. This is an adv- --

7 Q. What is that?

8 A. It's an advisory from the secretary of
9 state's office, Keith Ingram, the director,
10 January 21st. It's marked January 21st.

11 Q. Of what year?

12 A. Of 2022. I'm sorry. This is --

13 Q. Okay. Is that an advisory that you or your
14 office received sometime in 2022?

15 A. Yes, sir.

16 Q. Do you recall any actions that your office
17 took in response to or as a result of receiving that
18 advisory?

19 A. I'd have to go through it. But obviously
20 we -- we would have had to work on some -- work on
21 some of this.

22 Q. Well, I do want to give you a chance to
23 look through the exhibit. I hadn't -- you haven't
24 had that chance yet.

25 A. (Witness complies.) Okay. This talks

1 about the seven people curbside. This is 2022.

2 Okay. Yeah. I mean, this we -- yeah. We didn't

3 have temporaries. All right. I think... okay.

4 Okay, we're good.

5 Q. Okay. Do you recall any use that your
6 office made of that in connection with the general
7 election in 2022?

8 A. No, we -- we were good on this. We --
9 we -- we -- that didn't affect us, I should say.

10 Q. Okay. When you say you were "good on it,"
11 you mean that --

12 A. We were in compliance with everything.

13 Q. -- you had already complied with the
14 items --

15 A. Yes.

16 Q. -- in Exhibit 4?

17 A. Yes, sir.

18 (Exhibit 5 was marked.)

19 Q. BY MR. BRYANT: Let me hand you what's been
20 marked as Exhibit JC3, 5. Can you --

21 A. This is -- this is six days later.

22 Q. Can you --

23 A. Oh, this is the by-mail one. Uh-huh.

24 Q. Can you identify that document?

25 A. Yes, sir. It's an advisory that comes down

1 from the secretary of state's office, again,
2 Keith Ingram director, and this was six days later,
3 and it was the -- the scenarios and the possible
4 scenarios about the new SB-1 for the rejection of the
5 ABBM, all the requirements -- the new comparison
6 requirements for the early ballot board, as we talked
7 about, who gets to send out, who gets to open,
8 timelines.

9 Yes. Yes, we -- we worked a lot with this
10 advisory. This -- this had a lot of changes for us.
11 Yes, sir.

12 Q. Did you or your office use Exhibit 5 in
13 connection with the general elections in 2022?

14 A. Yes, sir.

15 Q. And could you describe what you did in that
16 regard?

17 A. Again, this was the completely new process
18 that we were brought into based on SB-1 where we had
19 to make all the accommodations for the identifiers,
20 the SSNs, TDLs, and where we could only send out, you
21 know, one application.

22 This talked about bringing in your early
23 ballot board earlier, that they had the ones to cure.
24 This talked about the ballot corrective -- ballot
25 tractor -- ballot tracker, early voting ballot board

1 corrective action. It talked about -- I think we
2 talked previously about them mailing out the -- the
3 reject letters. It's that the voter could come and
4 cure things at the office if they were notified by
5 phone or if they got their letter or by e-mail.

6 So, yes, this -- this had a -- a huge -- a
7 huge impact on what we had done previously. And
8 verifying your -- the IDs on the carrier envelopes.
9 It just -- yeah, absolutely, this -- this was sort of
10 our Bible to institute all the new policies we had
11 for SB-1.

12 Q. And is this similar to Exhibit 4 in that by
13 the time of the general election in 2022 your office
14 was good with respect --

15 A. In compliance.

16 Q. -- to these procedures and in compliance
17 with them?

18 A. Yes, sir. And we had -- you know,
19 obviously had time to tweak them and to -- lessons
20 learned.

21 (Exhibit 6 was marked.)

22 Q. BY MR. BRYANT: Let me show you what's been
23 marked as Exhibit 6, JC3, Exhibit 6. Can you
24 identify that one?

25 A. Here's one that came two weeks later. It's

1 from the secretary of state's office, Keith Ingram,
2 director. And this is a clearing up a little bit
3 more of the questions that the 22nd one brought when
4 we -- when we saw the first directives for the mail
5 ballots and the advent of S- -- SB-1. This one
6 followed up about two weeks later what was verifying
7 questions. It was the 28th. I'm sorry. I misspoke.

8 Q. Okay. So, when you refer to the --

9 A. And so then this came in --

10 Q. -- 22nd one, were you referring to --

11 A. Jan- --

12 Q. -- Exhibit 5?

13 A. Yes, sir.

14 Q. Okay.

15 A. And so, that was the 28th. And so, then
16 they sent out, basically, a -- an updated or a
17 corrective advisory to -- to answer some questions
18 that -- that -- that had arisen from when they sent
19 a -- the one on January 28th.

20 Q. And did your office use Exhibit 6 in
21 connection with the general election in 2022?

22 A. Yes, sir.

23 Q. And was it also true that by the time of
24 that general election in 2022, your office was,
25 quote, "good," unquote, and in compliance with

1 Exhibit 6?

2 A. Yes, sir.

3 (Exhibit 7 was marked.)

4 Q. BY MR. BRYANT: Let me show you what's been
5 marked as JC3, Exhibit 7.

6 A. Okay. April. We went from February to
7 April. Again, additional ballot by mail procedures
8 for the May election. Now, this is for the May
9 spring uniform election date, which is not --
10 obviously, this was for the primary in March.

11 Q. When you say "this," are you referring to
12 Exhibit 6?

13 A. Both of these, yes. These were --

14 Q. 5 and 6?

15 A. Yes. These were first instituted for the
16 primary in March. And then we have a May spring
17 election, a uniform election date, the first Saturday
18 in May. And so this was additional information for
19 us, for the -- the local entities. Because it -- it
20 can become a little bit confusing.

21 But because our entities contract with us,
22 we were under the exact same provisions here. This
23 was here for a city that does not contract with the
24 county who -- like, we -- we're -- because we had the
25 primary, we also had possession of the ABBMs. We

1 knew the good ones and that.

2 When you hold a May election, if you have a
3 city or school district, water district, that does
4 not contract with the county, then this explains that
5 our responsibility, the county's responsibility,
6 would be to get the ABBMs to get the good
7 applications for ballot by mail to that entity so
8 that they can mail their ballots to that person.

9 And so, that's what this is. That you --
10 you -- you have to work -- work with the -- the city,
11 school district, MUD, whatever to make sure. And
12 since we were the keeper of it, this tells them how
13 to do that.

14 Q. When you say "this," you're referring to
15 Exhibit 7?

16 A. 7. Yes, sir.

17 Q. Okay. Now, did you make any use of
18 Exhibit 7 in connection with the general election?

19 A. No. I mean, we -- we looked at
20 everything -- again, it -- it all played into it. It
21 was just a little bit more if you have a reject
22 because it dealt with the cities returning the
23 information to us. So, we would front the cities.
24 If they didn't contract, we didn't -- this didn't
25 affect us at all because everyone contracts with us.

1 But if you had an entity that was going to
2 do it on their own, this dealt with that. And then
3 at the end of that, that entity is supposed to get
4 back with you so that voting history and all of
5 that's been fixed.

6 Q. Okay. Was the advisory that's Exhibit 7
7 applicable at all to the general election in 2022?

8 A. Probably, but not -- not like the other one
9 was.

10 Q. Okay.

11 (Exhibit 8 was marked.)

12 Q. BY MR. BRYANT: Let me hand you what's been
13 marked as Exhibit JC3 --

14 A. It's a lawsuit.

15 Q. -- 8.

16 A. It's a lawsuit. Is this this one, Lisa?

17 MS. CUBRIEL: Yes.

18 THE WITNESS: Is it this one?

19 MS. CUBRIEL: You should look at all the
20 pages of what he's handed you.

21 THE WITNESS: Okay. Oh, no, this is
22 different. This is -- okay. This is the question
23 and answers. Oh, I'd like to read this.

24 Q. BY MR. BRYANT: Please take your -- as much
25 time as you want to read it.

1 A. This is -- this is -- oh, we just signed
2 this yesterday. I see what this is. Okay. This is
3 when they're asking for other stuff, and this is the
4 one we objected to and we denied; right?

5 MS. CUBRIEL: Yes.

6 THE WITNESS: Okay. Okay.

7 Q. BY MR. BRYANT: So, can you -- can you tell
8 us what Exhibit 8 is.

9 A. I guess this is the -- the answer. Is
10 that -- I don't know the word that you use.

11 MS. CUBRIEL: I would advise you to flip to
12 Page 2 and read the title.

13 THE WITNESS: Okay. "Defendant Bexar
14 County Elections Administrator Jacquelyn Callanen's
15 Responses to the State Defendants First Request for
16 Admissions and the First Set of Interrogatories."
17 Okay. That's what this is.

18 Q. BY MR. BRYANT: Okay. And so, are those --

19 A. February.

20 Q. -- responses and answers that you --

21 A. This year.

22 Q. -- through your counsel provided in this
23 case?

24 A. Yes.

25 Q. Okay. And you're correct, that most of --

1 most of the responses were objections, but there were
2 a couple of questions -- a few questions that were
3 answered at the back regarding, for example, a
4 request for an admission, Number 17, "Admit that
5 30,401 ballots by mail were accepted in Bexar County
6 during the November 8th, 2022."

7 A. Oh, okay. Uh-huh.

8 Q. And the response was denied. Interrogatory
9 asks, well, if you deny it, could you explain why.
10 And you quoted the number from the reconciliation
11 form which is JCF [sic] --

12 A. Uh-huh.

13 Q. -- 2.

14 A. Right.

15 Q. And I just wanted to again ask you to
16 confirm that -- that the numbers that appear on JC3,
17 Exhibit 2 --

18 A. Uh-huh.

19 Q. -- are the -- the very best numbers that
20 are the ones that you used in your interrogatory
21 answers?

22 A. Right. May I explain?

23 Q. Certainly.

24 A. Okay. Again, there's so many different
25 pieces to the elections. This, on the ballots, we

1 haven't -- we haven't touched on, and I know it's
2 probably in there somewhere, the limited ballots.
3 And a limited ballot is a ballot that's cast at the
4 main early voting site during early voting by
5 citizens who have moved within Texas into Bexar
6 County, and they haven't registered to vote in Bexar
7 County. They were moving in or whatever.

8 And so, they can come down to us. We check
9 to see that, in fact, they were registered in Collin
10 County, or you know. And then the paperwork they do
11 cancels their registration in that other county. We
12 register them immediately here and they get to vote
13 on things that would have been on their ballot in
14 Collin County.

15 So, they would have gotten to vote for the
16 State offices, you know, some of the same district
17 offices, but no local offices. But then those are
18 processed. And so, they come through on these --
19 these numbers.

20 Q. So, those -- those --

21 A. So those other additions --

22 Q. -- types of limited votes --

23 A. Yes.

24 Q. -- that ultimately appear --

25 A. On our master list.

1 Q. -- are included within the reconciliation
2 that's Exhibit 2?

3 A. Yes, sir.

4 Q. Are there any other wrinkles like that
5 that --

6 A. No, 'cause I think we've talked about
7 provisionals and we've talked about the late ballots
8 and the military and then but the limiteds we hadn't
9 talked about.

10 (Exhibit 10 was marked.)

11 Q. BY MR. BRYANT: Let me hand you what's been
12 marked as Exhibit JC3, Exhibit 10.

13 A. Oh, uh-huh. Good. This is the one we
14 talked about. Uh-huh.

15 Q. Okay. Could you --

16 A. Our generic --

17 Q. -- explain for the record what that is.

18 A. I'm sorry. This is the rejected -- this is
19 our notice of rejected application for ballot by
20 mail. This is where I spoke about it being the
21 generic one where Lisa sits there and just fills out
22 why, why, why, and then sends it out with a new
23 application.

24 Q. So, this is -- this is the form that
25 Bexar County uses that might include multiple --

1 A. Correct.

2 Q. -- reasons for --

3 A. They were asked previously.

4 Q. -- rejection of a mail-in ballot?

5 A. Yes, sir.

6 Q. Okay. Could you tell me whether that form
7 bears a date at the upper left-hand corner?

8 A. Yes, sir. January of '22.

9 Q. Okay. Do you know if that form was in use
10 in the general elections in 2022?

11 A. Yes, sir, it was.

12 Q. Okay. Let me --

13 MS. CUBRIEL: You don't have a copy for me,
14 do you?

15 MR. BRYANT: I do, down there somewhere.
16 And I will -- we can take a break and I get it -- can
17 get it now, or we can get it when we do take a break.
18 I'm not going to ask significant additional questions
19 about it.

20 Q. BY MR. BRYANT: Miss Callanen, let me first
21 of all give you whatever time you -- you would like
22 to have to review Exhibit 10; although, I'm not going
23 to ask you any additional questions about it.

24 A. Okay.

25 Q. But if you see something on there that you

1 think needs to be explained, I appreciate the
2 explanation.

3 A. Thank you.

4 (Exhibit 11 was marked.)

5 Q. BY MR. BRYANT: Okay. I want to hand you
6 what's been marked as Exhibit JC3, 11.

7 A. Again, January twenty sec- -- January 2022.

8 Q. Okay. What is that, Exhibit 11?

9 A. Again, notice of rejected application for a
10 ballot by mail.

11 Q. Okay.

12 A. So --

13 Q. Can you explain the -- the reason that
14 Exhibit 10 is different from Exhibit 11.

15 A. Again, this one is -- 10 -- I'm sorry. 10
16 is the generic one that I spoke to that you can check
17 multiples on. 11 is the one that deals, basically,
18 strictly with your personal ID information was
19 missing. And so, this -- this one was -- was
20 required. And this one had much more detail on it
21 than, obviously, the space could allow for this one.
22 More in-depth. But again, this -- this one drills
23 down to your TDL, your voter registration number.

24 Q. To what extent was Exhibit 11 used by
25 Bexar County in connection with the -- the general

1 election in 2022?

2 A. Again, it was included with -- with this.
3 If one of --

4 Q. With Exhibit 10?

5 A. If one of the reasons was the missing
6 identifiers, then this was included. But if it was a
7 signature or something else, multiple, then this one
8 was used. We're going to go through that whole
9 stack.

10 (Exhibit 12 was marked.)

11 Q. BY MR. BRYANT: Let me hand you what's been
12 marked as Exhibit JC3, Exhibit 12.

13 A. I know -- I know your plan now.

14 MS. CUBRIEL: Did you skip 9?

15 MR. BRYANT: Number 9 is the insert --

16 THE WITNESS: Okay.

17 MR. BRYANT: -- that we talked about
18 earlier. So, I got to Exhibit 9 earlier out of
19 order.

20 THE WITNESS: You're good, Lisa. Uh-huh.

21 Q. BY MR. BRYANT: Miss Callanen, can you
22 identify what Exhibit 12 is.

23 A. Sure. This is -- this is the current
24 secretary of state handbook for a poll watcher. It's
25 the poll watcher guide.

1 Q. Okay. Was that Exhibit 12 in use in
2 Bexar County during the 2022 general election?

3 A. Yes, sir.

4 Q. And what use was made of it in connection
5 with the general election in 2022?

6 A. Well, as I said previously, I made sure
7 that all of our election officials had a copy of this
8 so that they could prepare themselves since the poll
9 watcher function had changed considerably.

10 Q. Okay. And approximately when was
11 Exhibit 12 made available to you and your office?

12 A. It was updated January of 2022.

13 Q. And was it made --

14 A. So --

15 Q. -- available to you shortly after that or
16 was it later in the year?

17 A. I want to say shortly after this because we
18 really rushed to get it out for the primary.

19 (Exhibit 17 was marked.)

20 Q. BY MR. BRYANT: Okay. Let me show you
21 what's been marked as Exhibit JC3, 13. Can you
22 identify that?

23 A. Yes, sir. It's the handbook, the secretary
24 of state's handbook, that was revised in July of
25 2022.

1 THE REPORTER: I just want to know is that
2 the 13 we marked at the beginning of the deposition?
3 That you went out of -- you said the last -- you
4 marked a 13 at the beginning of the deposition. Is
5 that...

6 MS. PAIKOWSKY: I think Exhibit 13 was
7 this -- was the insert.

8 THE REPORTER: Yeah, I think you marked the
9 insert as 13.

10 MR. BRYANT: Okay.

11 THE REPORTER: I marked it down.

12 (Off-the-record discussion.)

13 MR. BRYANT: Unless there's an objection
14 from counsel, I will remark the document as 17?

15 MS. PAIKOWSKY: Sounds good.

16 MR. BRYANT: Okay.

17 Q. BY MR. BRYANT: In different ink even. So,
18 I'm going to hand you again what has been marked as
19 Exhibit JC3, Exhibit 17 and ask you to identify that.

20 A. Yes, sir.

21 Q. And what is that exhibit?

22 A. This is the current election judge
23 handbook.

24 Q. Was Exhibit 17 in use in Bexar County in
25 the general election of 2022?

1 A. Yes, sir.

2 Q. Is that a document that you testified
3 earlier in your -- about earlier in your testimony
4 today?

5 A. Yes, sir.

6 Q. And what use was made of that Exhibit 17 by
7 your office in connection with the November 2022
8 general election?

9 A. Well, again, a copy of this was given to
10 all of the election officials. These went out
11 as a -- as a matched set.

12 Q. When you say "these" are you referring
13 to --

14 A. The poll watcher guide.

15 Q. Okay.

16 A. -- 12, and then 7 -- 17.

17 Q. 17? And were those provided to your office
18 about the same time in 2022?

19 A. Yes. Yes, sir.

20 Q. Okay. I'm going to ask you some different
21 questions. I recall or having read that in your
22 April 2022 depositions that there were some problems
23 of communication between the VOTEC system and the
24 TEAM system in the first half of '22 -- 2022. Do you
25 recall that?

1 A. Yes.

2 Q. Were those problems resolved by the time of
3 the general election in 2022?

4 A. Yes, sir. But again, we're still -- we
5 talked about requesting additional codes.

6 Q. Yes.

7 A. Because we -- we don't have a code for
8 multiples for instance. And so, as -- as we worked
9 our way through it. But, yes --

10 Q. Okay. When you --

11 A. -- it was mainly corrected for the
12 November 2022.

13 Q. Okay. And when you refer to "multiples,"
14 could you explain for the record what you mean by
15 that?

16 A. Well, again, today we've been speaking
17 about, you know, if -- if -- if something would be
18 rejected, was it rejected because there was no
19 signature. And that would check. But overlook, oh,
20 look, they didn't put their IDs either. And so, it
21 could be in either one of those categories.

22 And again, the way the system was set up
23 is, if we pushed the button, or if we filled in the
24 box for no signature, it -- that's all it took and it
25 went away so that we didn't have the opportunity to

1 make multiples, which has been a question that's been
2 asked here numerous times.

3 Q. Okay.

4 A. Excuse me.

5 Q. Earlier in your testimony today, I think in
6 response to some questions by Victor, you testified
7 that instances in which there were multiple reasons
8 to reject a -- a mail-in ballot were reviewed within
9 your office?

10 A. Yes, sir.

11 Q. When you say "reviewed," are you talking
12 about a review process that involved one person or
13 multiple people?

14 A. Well, again, the way -- my understanding,
15 the way it's set up is that if it was rejected, it
16 went to a higher, like, a manager and that -- in the
17 mail room to reject it, that the data processing
18 person would reject it, but then it was looked at
19 again a second time by a seasoned person, if -- if
20 that's the phrase you use.

21 Q. Okay.

22 A. Excuse me.

23 Q. I also wanted to be sure I understood your
24 testimony earlier today about how, in general, poll
25 watchers were distributed within Bexar County in

1 connection with the general election in 2022. Did I
2 understand you to testify correctly that the poll
3 watchers generally were concentrated more at the
4 polling locations with the highest numbers of voters?

5 A. Yes, that's -- that's how it -- yes.

6 Q. Okay. Was there -- was there any -- strike
7 that.

8 Was that true regardless of whether or not
9 the polling place had more or fewer Hispanic or
10 Spanish-speaking voters?

11 A. I'm sorry. Ask me that again.

12 Q. Okay. My understanding is that the poll
13 watchers were concentrated at the locations that had
14 the larger numbers of voters?

15 A. Yes.

16 Q. And my question is: Was that true
17 regardless of whether those locations were heavily
18 Spanish-speaking locations?

19 A. No. Like, Las Palmas would not fall in the
20 category of a high turnout poll site. It -- it -- it
21 didn't -- it didn't rise to that.

22 Q. Okay. And did it nevertheless have a
23 higher concentration of poll workers?

24 A. Yes, sir. Poll watchers.

25 Q. Poll watchers. Excuse me.

1 A. Poll watchers. Yes, sir.

2 Q. Okay. Okay. You testified earlier about
3 the inserts that you used in Bexar County in 2022 as
4 compared with the inserts that were made available by
5 the secretary of state. Do you recall that
6 testimony?

7 A. Yes, sir. Yes, sir.

8 Q. Did you use a different insert for the
9 general election in 2022?

10 A. Yes, sir.

11 Q. Did you use a different insert for all of
12 the elections in 2022 than the secretary of state
13 provided?

14 A. Yes, sir.

15 Q. I think you testified earlier that you had
16 amended the insert that was used in Bexar County at
17 least once?

18 A. Yes, sir.

19 Q. But I think multiple times. Were those
20 amendments all within 2022?

21 A. Yes, sir.

22 Q. And did you make a change in the insert
23 between the election in May of 2022 and the general
24 election in November of 2022?

25 A. Yes, sir.

1 Q. And why did you make that change?

2 A. Again, to make it clearer and cleaner, not
3 to confuse people.

4 Q. Did you make the secretary of state's
5 office aware of the change in the insert that Bexar
6 County made for the general election in 2022?

7 A. I don't think so.

8 Q. Okay. Earlier in your deposition you
9 testified that you -- that your office expended more
10 money for additional staff in response to SB-1. Do
11 you recall that?

12 A. Yes, sir.

13 Q. And was that the first unfunded change of
14 law that the Texas legislature has imposed on your
15 elections office?

16 A. No.

17 Q. Could you describe how the -- the other
18 times that come to mind in which that has been done.

19 MS. CUBRIEL: Objection. I think this is
20 going beyond the amended scheduling order, unless
21 we're limited to the year 2022.

22 THE WITNESS: Okay. But what immediately
23 came to mind, am I allowed to answer?

24 MS. CUBRIEL: You can answer if you know.

25 THE WITNESS: Okay. What immediately

1 came -- came to mind is, as the legislature for -- to
2 answer your question on unfunded mandates. They do
3 come down. When the State moved to voter ID, that
4 required a complete do-over of -- of manuals and
5 signage and large signage and more media and more of
6 all that, and that was an unfunded mandate. That one
7 come immediately to mind, so.

8 Q. BY MR. BRYANT: Are there others?

9 A. Yes, sir.

10 Q. We talked about the rejection rate of 1.7,
11 and I believe you were asked if you could ever bring
12 the rejection rate down to zero. Do you have any --
13 any view as to what's the -- kind of the lower limit
14 of a rejection rate that you could reasonably
15 achieve?

16 A. Again, I'm very proud of the -- the
17 November 2022 number. So, if we could match that
18 each time, that would be terrific.

19 Q. I believe that you testified that the
20 secretary of state's office did some updating of its
21 training of poll watchers, but that you -- you
22 thought that there's still room for improvement.
23 Have you communicated your -- your views on that
24 subject to the secretary of state's office in 2022 or
25 in 2023 to date?

1 A. No, sir.

2 Q. We talked a little bit about the issue of
3 poll watchers standing behind voters during the
4 process in which the voter is preparing to cast or is
5 casting their ballot. Do you recall that testimony?

6 A. Yes, sir.

7 Q. Are you aware of a secretary of state
8 advisory 2022-09 that states, "While the poll watcher
9 may be present if an election worker is assisting a
10 voter, a poll watcher may not be present at the
11 voting station when a voter is preparing the voter's
12 ballot or is being assisted by a person of the
13 voter's choice, including by a person serving as an
14 interpreter at the voting station." Does -- do you
15 recall that?

16 A. That's standard. That's been there for a
17 very long time. Yes, sir.

18 Q. Okay. So, were there any of the instances
19 that were reported to you in connection with the
20 general election in 2022 when poll watchers stood
21 behind the voters on an occasion when an election
22 worker was assisting the voter?

23 A. Yes.

24 Q. Did the ability for poll watchers to be
25 present at the voting station when the voter is being

1 assisted by an election officer exist prior to SB-1?

2 A. Yes, sir.

3 Q. Are you aware of any instance in which an
4 election judge, in connection with the general
5 election in 2022, attempted to remove a poll watcher
6 but was unable to do so?

7 A. Not to my knowledge.

8 Q. You mentioned that you replaced the
9 personnel at four polling locations in connection
10 with the general election in 2022; is that correct?

11 A. Yes. But I hate to hear it worded like
12 that because it sounds like we removed and replaced
13 them for a cause.

14 Q. Right.

15 A. And we didn't --

16 Q. I didn't --

17 A. Okay.

18 Q. I didn't intend to apply that.

19 A. So, please --

20 Q. As a matter of fact, my understanding was
21 that you had the new crew because the old crew was no
22 longer --

23 A. Chose not to --

24 Q. Was not going to be there.

25 A. Correct. Correct.

1 Q. Okay.

2 A. I just wanted to make sure that that stays
3 in the record.

4 Q. Very good. And that's four polling
5 locations out of how many?

6 A. 302.

7 Q. Is it typical to see some level of
8 attrition among election judges and poll workers from
9 year to year?

10 A. Oh, sure. Absolutely.

11 Q. Okay. To your knowledge, did Bexar County
12 or anybody in your office engage in any kind of
13 racial discrimination in connection with the general
14 election in 2022?

15 A. No, sir.

16 Q. Had you become aware of that, would you
17 have taken immediate corrective action?

18 A. Absolutely.

19 Q. Okay.

20 MR. BRYANT: I'll pass the witness.

21 MS. PAIKOWSKY: United States has no
22 more -- United States has no further questions for
23 this witness.

24 MR. GENECHIN: And the -- all Plaintiffs
25 have no further questions. Thank the witness very

1 much.

2 THE WITNESS: Sure. Bless you. Thank you.

3 MR. BRYANT: Thank you.

4 MS. CUBRIEL: Do we have to open it up to
5 everybody online?

6 THE WITNESS: Oh, dear God.

7 THE VIDEOGRAPHER: The time is 3:51 p.m.
8 and this concludes today's deposition. We are off
9 the record.

10 (Whereupon, the proceedings were concluded at
11 3:51 p.m.)

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February 28, 2023
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1 I, JACQUELYN CALLANEN, have read the
2 foregoing deposition and hereby affix my signature
3 that same is true and correct, except as noted above.
4
5

6 _____
JACQUELYN CALLANEN
7

8 STATE OF TEXAS:

9 COUNTY OF BEXAR:

10 Before me, _____,
11 on this day personally appeared JACQUELYN CALLANEN,
12 known to me, or proved to me under oath or through ID
13 or other document, to be the person whose name is
14 subscribed to the foregoing instrument and
15 acknowledged to me that they executed the same for
16 the purposes and consideration therein expressed.

17 Given under my hand and seal of office this
18 _____ day of _____, A.D., 2023.
19
20

21 _____
22 NOTARY PUBLIC IN AND FOR
23 THE STATE OF TEXAS
24
25

My Commission Expires: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO
ENTERO, ET AL.,

Plaintiffs,

vs.

GREGORY W. ABBOTT, ET AL.,

Defendants.

Case No. 5:21-CV-844-XR

OCA-GREATER HOUSTON,
ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

Case No. 1:21-CV-780-XR

HOUSTON JUSTICE, ET AL.,

Plaintiffs,

vs.

GREGORY WAYNE ABBOTT,
ET AL.,

Defendants.

Case No. 5:21-CV-848-XR

LULAC TEXAS, ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

Case No. 1:21-CV-0786-XR

MI FAMILIA VOTA, ET AL.,

1 That a copy of this certificate was served
2 on all parties and/or the witness shown herein on
3 _____.

4 I further certify that pursuant to FRCP
5 Rule 30(f)(1) that the signature of the deponent:

6 _____ was requested by the deponent or
7 a party before the completion of the deposition and
8 that the signature is to be before any notary public
9 and returned within 30 days from date of receipt of
10 the transcript. If returned, the attached Changes
11 and Signature Page contains any changes and the
12 reasons therefore:

13 _____ was not requested by the deponent
14 or a party before the completion of the deposition.

15 I further certify that I am neither counsel
16 for, related to, nor employed by any of the parties
17 or attorneys in the action in which this proceeding
18 was taken, and further that I am not financially or
19 otherwise interested in the outcome of the action.

20 Certified to by me on this 12th day of
21 March, 2023.

22 *Pamela Sue Peterson*

23 PAMELA SUE PETERSON, CSR
24 Texas CSR 8924 - Expires 10-31-23
25 Firm Registration No. 633
 Magna Legal Services
 16414 San Pedro, Suite 900
 San Antonio, Texas 78232
 (210) 697-3400

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1 COUNTY OF BEXAR)?
2)
3 STATE OF TEXAS)

4 I hereby certify that the witness was
5 notified on _____ that the witness
6 has 30 days or (_____ days per agreement of
7 counsel) after being notified by the officer that the
8 transcript is available for review by the witness and
9 if there are changes in the form or substance to be
10 made, then the witness shall sign a statement
11 reciting such changes and the reasons given by the
12 witness for making them:

13 That the witness' signature was/was not
14 returned as of _____.

15 Subscribed and sworn to on this, the
16 _____ day of _____, 2023.

17
18
19
20 _____
21 PAMELA SUE PETERSON, CSR
22 Texas CSR 8924 - Expires 10-31-23
23 Firm Registration No. 633
24 Magna Legal Services
25 16414 San Pedro, Suite 900
San Antonio, Texas 78232
(210) 697-3400

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